



413630

Forma Number 164777 06/24/97  
88902 DYGERT SEATING, INC.  
88902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

\*\*\*\*\* MATTER BILLING ADDRESS \*\*\*\*\*  
88902 DYGERT SEATING, INC.  
ATTN: MR. DAVE DYGERT  
P.O. BOX 847  
ELKHART, IN 46515

\*\*\*\*\* CLIENT BILLING ADDRESS \*\*\*\*\*  
DYGERT SEATING, INC.  
ATTN: MR. DAVE DYGERT  
P.O. BOX 847  
ELKHART, IN 46515

88902-000001 GENERAL

Index	Attorney	Date	Hours	Stat	Matter Value	Task	Activity Description of Services Rendered
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100	00375MBW	01/31/97	8.20	B	1,517.00		
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			2.60	B	224.00		
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BK000898

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288902 DYGERT SEATING, INC.  
288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

0533 00520SMK 01/31/97 ~~4.40~~ B ~~990.00~~  
1.6 280.-

Provided assistance to Attorney Watkins in connection with complying with initial Chapter 11 filing and operation requirements (.3);

reviewed drafts of Motion for Order Extending Scope of Automatic Stay, Motion to Retain Pre-Petition Bank Accounts, Motion to Pay Pre-Petition Wages, Salaries and other Employee Benefits and related pleadings and forms of order (1.3);

3654 00531BJC 01/31/97 .80 B 144.00  
3662 00532GKC 01/31/97 ~~4.30~~ B ~~903.00~~  
1.6 336.-

Reviewed tax issues on insolvency.

Phone conference with M. Watkins re: Chapter 11 hearings and meetings with counsel; phone conference with D. Dygert re: same;

1713 00545MJA 01/31/97 .80 B 120.00

Attended meeting with attorneys Watkins and Keller regarding (a) status of negotiations between Dygert, NBD Bank and prospective purchaser and remaining issues in dispute, (b) additional preliminary matters to handle for Dygert as debtor-in-possession, including obtaining authority for payment of prepetition wages and retention of existing bank accounts

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704 00532GKC 02/01/97 ~~1.80~~ B ~~278.00~~  
.2 42.-

003 ~~00532GKC 02/01/97 1.80~~ 10.50

458 ~~00532GKC 02/01/97 1.80~~

346 00520SMK 02/03/97 ~~6.30~~ B ~~1,102.50~~  
5.9 1032.50

718 ~~00532GKC 02/01/97 1.80~~

370 00520SMK 02/04/97 ~~6.30~~ B ~~1,207.50~~  
.7 122.50

as DIP accounts, and (c) strategy for continued negotiations and handling of Chapter 11 case until liquidating sale (.5); reviewed materials documenting Dygert's current assets, liquidation analysis and issues for settlement negotiations and matters to be addressed in Dygert's Chapter 11 bankruptcy case (.3).

Review and organize files; [REDACTED]

telephone conference with Dygert personnel regarding utility deposit and other general post-petition operations issues (.2); telephone conference with Attorney for Gemini Plastics regarding information related to bankruptcy case (.2); traveled to Elkhart and attended meeting with Attorney Church, Dave Dygert and other Dygert representatives concerning all pending Chapter 11 operation issues, sale negotiations and various motions to be filed (5.5).

Received and reviewed information from Dygert relating to post-petition bank accounts (.2); reviewed messages from Attorney Church and M&I Leasing regarding Chapter 11 issues (.3);

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389 00520SMK 02/05/97 ~~5.80~~ B ~~1,015.00~~  
1.6 280.-

[REDACTED] telephone conference with  
Mr. Langonal from M&I Leasing regarding status  
of equipment lease (.2); [REDACTED]

[REDACTED] received and reviewed pro  
forma income statement and other financial  
information from Dygert and conducted analysis  
as to whether company can operate in Chapter 11  
without additional financing (1.2); received  
and reviewed pre-petition payroll information  
from Dygert (.2); received and reviewed  
correspondence from Ms. Stephan regarding  
bankruptcy information to Dygert's vendors and  
conducted follow-up work regarding same (.2).

411 00520SMK 02/06/97 ~~6.30~~ B ~~1,102.50~~  
.4 70.-

Telephone conference with Mr. Rader regarding  
initial debtor conference issues (.2); [REDACTED]

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518	00517SAR	02/07/97	.30	B	27.00
426	00520SMK	02/07/97	<del>8.90</del>	B	<del>1,557.50</del>
			.5		87.50

telephone conference with Attorney Ephramson  
regarding creditor committee issues (.2);

telephone conference with trade  
creditor regarding bankruptcy case information  
(.2);

received

Put together packet of documents filed to date  
to send to FlexSteel's counsel per attorney  
Keller's request.

Telephone conference with trade creditor  
regarding bankruptcy information (.2);

received and reviewed

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445	00520SMK	02/08/97	<del>1.50</del>	B	<del>262.50</del>
			.4		70.-
900	00321RWB	02/10/97	.20	B	47.00
171	00375MBW	02/10/97	<del>7.00</del>	B	<del>1,442.00</del>
			3.6		666.-

debtor's conference materials from US Trustee's office (.3); [REDACTED]

[REDACTED] received and reviewed Bankruptcy notice and docketed key dates (.2); received and reviewed Appearance and Request for Notices along with Proof of Claim filed by attorney for Absecon Mills (.2).

Correspondence to EEOC and ICRC advising of pending bankruptcy.

[REDACTED] responded to a number of creditor inquiries concerning the bankruptcy filing and reviewed the committee appointment made by the Trustee and further reviewed the trustee's guidelines and began preparing the debtor's responses to the requisite informational sections in preparation for the initial debtor conference and [REDACTED]

(3.6)

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923 00517SAR 02/10/97 .40 B 36.00

[REDACTED]  
Office conference with attorney Watkins regarding request from attorney Benko for order regarding staying proceedings (.2); office conference with attorney Benko to provide him with copy of proof of claim (.2).

1454 00520SMK 02/10/97 ~~7.20~~ B 1,250.00  
1-1 192.50

Telephone conference call with Dave Dygert and Attorney Watkins regarding status of negotiations with Flexsteel and Innkeepers and other potential alternatives for reorganization or sale of company (.3); had meeting with Attorney Watkins regarding status of all pending matters and prepared notes regarding issues (.4); [REDACTED]

[REDACTED] received and reviewed Notice regarding appointment of Creditors Committee and drafted memo to Dave Dygert regarding same (.2); [REDACTED]

[REDACTED] drafted memo to Attorney Church regarding various filings in case (.2); [REDACTED]

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953 00517SAR 02/11/97 .80 B 72.00

[REDACTED]

Obtained current docket and supplied same to attorney Keller (.2); conferred with attorney Watkins regarding contacting Judge Rodibaugh's law clerk to check court's availability for possible emergency hearing (.2); telephone conference with Judge's clerk to discuss same (.2); additional conference with attorney Watkins to discuss Judge's availability (.2).

473 00520SMK 02/11/97 ~~9.60~~ B ~~1,680.00~~  
1.2 210.-

[REDACTED]

numerous conferences with Attorney Watkins regarding all pending matters and Motions (1.0); reviewed docket for appearances in preparation for certificate of service (.2);

[REDACTED]

BK000905



Billing Arrangement: Hourly

'577            00375MBW    02/12/97

~~3.00~~ B  
.3

~~666.00~~

148.-

(-8)

Finalized the draft responses of Dygert Seating to the U.S. Trustee's initial conference reports and forwarded same to Rita Stephan for review and comment [redacted]

1497 00520SMK 02/12/97

~~7.70~~ B  
 . 8~~37347-50~~

140.-

several conferences with Attorney Watkins regarding all pending matters and revisions to order approving sale to Flexsteel (.6); conferred with Attorney Church regarding status of all pending matters (.2);

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001 00000000 02/24/97 0.40 B 504.00

010 00000000 02/24/97 0.40 B 504.00

0990 00517SAR 02/13/97 2.70 B 243.00

[REDACTED]

[REDACTED]

[REDACTED]

Conferred with attorney Watkins regarding preparing for and overseeing mass mailing of notices. Began preparing for mailing by having matrix list typed into computer to produce

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.523 005209MK 02/13/97 ~~8.70~~ B

~~1,522.50~~

.6

105.5

labels (.20); prepared letter to attorney Efrayson at Ice Miller enclosing complete set of all documents filed to date in this matter (.3); assisted attorney Watkins and Keller in finalizing documents to be filed (1.0); multiple telephone conferences with clerk's office regarding date and time for hearings (.6); additional conferences with attorneys Keller and Watkins regarding scheduling of hearings.

telephone conference with Attorney Boyne regarding local representation of Flexsteel (.2); telephone conference with Attorney Ephramson regarding information requested by Creditors Committee (.2);

conferred with Paralegal Money regarding preparation of documents requested by Creditors Committee's counsel (.2);

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=====

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

998 00517SAR 02/14/97 3.10 B 279.00

Multiple telephone conferences with Judge  
Rodibaugh's law clerk to verify hearing and  
objection dates (.6); telephone conference with

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Bankruptcy Clerk regarding signing Notices immediately to send out to creditors (.2); numerous conferences with attorneys Keller and Watkins in assisting in finalizing Emergency Application to Sell, Emergency Motion for Entry of Order Approving Stipulated Post-Petition Financing Agreement with Dave and Phyllis Dygert, Notice for same, Emergency Motion for Entry of Order Approving Stipulated Post-Petition Financing Agreement with Flexsteel and Notice for same, Motion to Shorten Notice and Set Expedited Hearing and Notice (1.0); filed above with clerk's office and met with Judge Rodibaugh to obtain his signature on the Orders (.5) oversaw mass mailing of Notice and Order regarding Motion to Shorten Notice Time; set Expedited Hearing (.4); obtained various documents to be sent to Efroymsen (.4).

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1597 002753PM 02/17/97 1.90 B 189.00

1597 002753PM 02/17/97 1.90 B 189.00

1640 006200PM 02/17/97 1.90 B 231.750

1640 006200PM 02/17/97 1.90 B 231.750

1461 005179AR 02/17/97 .80 B 72.00

1761 005205MK 02/17/97 1.60 B 280.00

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Prepared Certificate of Service regarding Notice of Emergency Application (.2); prepared Certificate of Service for Motion to Shorten Notice Time Regarding Emergency Application to Sell (.2); Prepared Certificate of Service for Notice of Emergency Motion for Entry of Order approving stipulated post-petition financing arrangement with Flexsteel Industries, Inc. (.2); prepared Certificate of Service for emergency Motion for Entry of Order approving stipulated post-petition financing arrangement with Dave and Phyllis Dygert (.2).

Telephone conference with Dave Dygert regarding

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motion relating to payment of pre-petition wages (.2); worked on draft of motion for retroactive approval of post-petition payment of pre-petition wages and salaries (1.2); conferred with attorney Watkins regarding preparation for debtors conference and status of all pending matters (.2).

2692 005208MK 02/18/97 3.70 B 647.50

1585 00375MBW 02/18/97 2.00 B 526.50

7775 005208MK 02/18/97 3.70 B 647.50

2.6

455.-

; made revisions to motion for retroactive approval of post-petition payment of pre-petition salaries and wages (.4); worked on draft of motion to retain pre-petition bank accounts (.9); drafted memo to Ms. Stephan regarding motion for approval of payment of pre-petition wages (.2); telephone conference with Dave Dygert regarding motion for retroactive approval of post-petition payment of pre-petition wages (.2); revised and finalized motion (.3); drafted form of notice for motion for retroactive approval of post-petition payment of pre-petition wages (.3); drafted form of notice for motion to retain pre-petition bank accounts (.3).

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**Billing Arrangement: Hourly**

3107 226.00

175-176-177-178-179-180-181-182-183-184-185-186-187-188-189-190-191-192-193-194-195-196-197-198-199-200-201-202-203-204-205-206-207-208-209-210-211-212-213-214-215-216-217-218-219-220-221-222-223-224-225-226-227-228-229-230-231-232-233-234-235-236-237-238-239-240-241-242-243-244-245-246-247-248-249-250-251-252-253-254-255-256-257-258-259-260-261-262-263-264-265-266-267-268-269-270-271-272-273-274-275-276-277-278-279-280-281-282-283-284-285-286-287-288-289-290-291-292-293-294-295-296-297-298-299-300-301-302-303-304-305-306-307-308-309-310-311-312-313-314-315-316-317-318-319-320-321-322-323-324-325-326-327-328-329-330-331-332-333-334-335-336-337-338-339-340-341-342-343-344-345-346-347-348-349-350-351-352-353-354-355-356-357-358-359-360-361-362-363-364-365-366-367-368-369-370-371-372-373-374-375-376-377-378-379-380-381-382-383-384-385-386-387-388-389-390-391-392-393-394-395-396-397-398-399-400-401-402-403-404-405-406-407-408-409-410-411-412-413-414-415-416-417-418-419-420-421-422-423-424-425-426-427-428-429-430-431-432-433-434-435-436-437-438-439-440-441-442-443-444-445-446-447-448-449-450-451-452-453-454-455-456-457-458-459-460-461-462-463-464-465-466-467-468-469-470-471-472-473-474-475-476-477-478-479-480-481-482-483-484-485-486-487-488-489-490-491-492-493-494-495-496-497-498-499-500-501-502-503-504-505-506-507-508-509-510-511-512-513-514-515-516-517-518-519-520-521-522-523-524-525-526-527-528-529-530-531-532-533-534-535-536-537-538-539-540-541-542-543-544-545-546-547-548-549-550-551-552-553-554-555-556-557-558-559-560-561-562-563-564-565-566-567-568-569-570-571-572-573-574-575-576-577-578-579-580-581-582-583-584-585-586-587-588-589-590-591-592-593-594-595-596-597-598-599-600-601-602-603-604-605-606-607-608-609-610-611-612-613-614-615-616-617-618-619-620-621-622-623-624-625-626-627-628-629-630-631-632-633-634-635-636-637-638-639-640-641-642-643-644-645-646-647-648-649-650-651-652-653-654-655-656-657-658-659-660-661-662-663-664-665-666-667-668-669-670-671-672-673-674-675-676-677-678-679-680-681-682-683-684-685-686-687-688-689-690-691-692-693-694-695-696-697-698-699-700-701-702-703-704-705-706-707-708-709-710-711-712-713-714-715-716-717-718-719-720-721-722-723-724-725-726-727-728-729-730-731-732-733-734-735-736-737-738-739-740-741-742-743-744-745-746-747-748-749-750-751-752-753-754-755-756-757-758-759-760-761-762-763-764-765-766-767-768-769-770-771-772-773-774-775-776-777-778-779-780-781-782-783-784-785-786-787-788-789-790-791-792-793-794-795-796-797-798-799-800-801-802-803-804-805-806-807-808-809-810-811-812-813-814-815-816-817-818-819-820-821-822-823-824-825-826-827-828-829-830-831-832-833-834-835-836-837-838-839-840-841-842-843-844-845-846-847-848-849-850-851-852-853-854-855-856-857-858-859-860-861-862-863-864-865-866-867-868-869-870-871-872-873-874-875-876-877-878-879-880-881-882-883-884-885-886-887-888-889-890-891-892-893-894-895-896-897-898-899-900-901-902-903-904-905-906-907-908-909-910-911-912-913-914-915-916-917-918-919-920-921-922-923-924-925-926-927-928-929-930-931-932-933-934-935-936-937-938-939-940-941-942-943-944-945-946-947-948-949-950-951-952-953-954-955-956-957-958-959-960-961-962-963-964-965-966-967-968-969-970-971-972-973-974-975-976-977-978-979-980-981-982-983-984-985-986-987-988-989-990-991-992-993-994-995-996-997-998-999-1000-1001-1002-1003-1004-1005-1006-1007-1008-1009-1010-1011-1012-1013-1014-1015-1016-1017-1018-1019-1020-1021-1022-1023-1024-1025-1026-1027-1028-1029-1030-1031-1032-1033-1034-1035-1036-1037-1038-1039-1040-1041-1042-1043-1044-1045-1046-1047-1048-1049-1050-1051-1052-1053-1054-1055-1056-1057-1058-1059-1060-1061-1062-1063-1064-1065-1066-1067-1068-1069-1070-1071-1072-1073-1074-1075-1076-1077-1078-1079-1080-1081-1082-1083-1084-1085-1086-1087-1088-1089-1090-1091-1092-1093-1094-1095-1096-1097-1098-1099-1100-1101-1102-1103-1104-1105-1106-1107-1108-1109-1110-1111-1112-1113-1114-1115-1116-1117-1118-1119-1120-1121-1122-1123-1124-1125-1126-1127-1128-1129-1130-1131-1132-1133-1134-1135-1136-1137-1138-1139-1140-1141-1142-1143-1144-1145-1146-1147-1148-1149-1150-1151-1152-1153-1154-1155-1156-1157-1158

2.

[REDACTED]

\_\_\_\_\_

[REDACTED]

(.2)

(.3.)

1.00 B

1. [REDACTED]

~~1.80~~ B

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288902 DYGBERT SEATING, INC.  
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Billing Attorney: Geoffrey K. Church

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5209 00532GKC 02/19/97 1.80 B 378.00

[REDACTED]  
[REDACTED]; revised  
and finalized Motion for Authority to Retain  
Pre-Petition Bank Accounts (.4); [REDACTED]

Phone conferences with D. Dygert re: 941 tax  
return, Mui Tran address, and agreement of  
Innkeepers; phone conferences with IRS; phone  
conference with Rita re: 941 return; phone  
conference with S. Keller; phone conferences  
with M. Watkins; phone conference with G. Lord.  
re. tax issues

1759 00343KAT 02/20/97 30 B 19.50

[REDACTED] in U.S.

3741 00375MBW 02/20/97 ~~3.30~~ B ~~610.50~~

.9

166.50

[REDACTED] received  
from the debtor the completed Initial Debtor  
Conference forms to deliver to the U.S. Trustee  
and discussing the nature of the conference  
with Rita Stephan who will be attending;

(.9)

6610 00517SAR 02/20/97 .80 B 72.00

Drafted Notice of Stay in case of Randstand  
Limited Partnership vs. Goshen Cushion, Inc.  
(.3); marked exhibits to the Joint Motion to  
Approve Stipulation for Adequate Protection and  
for use of cash collateral and request for  
emergency Preliminary Hearing (.2); arranged  
for filing of same, Notice and Order and for  
service of the Motion on the U.S. Trustee and  
S. Hostetler.

BK000914

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466
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Billing Arrangement: Hourly

005205MR

14297	00532GKC	02/20/97	<del>2.50</del> B	<del>525.00</del>
			9	189.-

14440 00375MBW 02/21/97 ~~3.50~~ B ~~647.50~~  
1.4 259.-

[REDACTED]

\_\_\_\_\_ conference with D. Dygert; phone conference with T. Frick; phone conference with J. O'Connor; memo to M. Watkins and S. Keller; phone conference with Peter re: Georgia tax issues and other tax concerns.

Prepared for and attended Initial Debtor Conference along with Mr. Dygert at the US Trustee's Office, with following discussions with Rita Stephan to retrieve the additional information requested by the Trustee and with message to the Bankruptcy Analyst as to the status of this additional information; reviewed memorandum from attorney Church regarding various operational and sale closing matters; conferred with attorney Church regarding same;

(1.4)

[REDACTED]

26663	00517SAR	02/21/97	1.00	B	90.00
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Finalized Notice of Stay (.2); sent copies of the Order Approving Sale and Emergency Application to Sell, Not in the Ordinary Course of Business, Substantially all of the Assets of the Debtor-In-Possession Free and Clear of Liens, Claims and Encumbrances to attorney Van Laere (.2); prepared Certificate of Service for serving copies of the Joint Motion to Approve Stipulation for Adequate Protection and for Use of Cash Collateral and Request for Emergency Preliminary Hearing on the Creditor's Committee, attorney Fritz and attorney

BK000915

Proforma Number 164777 06/24/97  
00288902 DYGERT SEATING, INC.  
00288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 20 (20)

Billing Arrangement: Hourly

526671 00520SMK 02/21/97 ~~.90~~ B ~~157.50~~  
105.-

Efroymson (.2); ran current docket and review of same to update Certificate of Service reflecting appearances not sent to attorneys Keller or Watkins (.4).

Telephone conference with Mr. Stewart at Bankruptcy Court regarding Notices on Motion to Retain Pre-Petition Bank Accounts and Motion for Retroactive Approval of Post-Petition Payment of Pre-Petition Wages (.2);

[REDACTED]; telephone conference with Ms. Pamerter regarding Motion notice issues (.2); telephone conference with Dave Dygert regarding trade creditor inquiry issues (.2).

515237 00532GKC 02/21/97 .70 B 147.00

Phone conference with Greg Huffman, counsel for unsecured creditor; phone conference with S. Keller; phone conference with M. Watkins.  
re: creditor claims and wage issues

~~515242 00532GKC 02/21/97 .60 B 106.00~~

~~515287 00136SDK 02/24/97 .30 B 85.00~~

~~515428 00343MBW 02/24/97 .20 B 15.00~~

515645 00375MBW 02/24/97 ~~7.00~~ B ~~1,295.00~~  
- 2 37.-

[REDACTED] responded to questions of Rita Stephan (employee of debtor) regarding completion of the Schedules and Statement of Affairs; [REDACTED]  
(.2)

BK000916

roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 21 (21)

Billing Arrangement: Hourly

26727 00517SAR 02/24/97 1.10 B 99.00

Prepared letter to Superior Court Clerk to file the Notice of Stay (.3); prepared Notice of Amendment of Matrix (.3); Prepared Verification of Matrix (.2); prepared letter to client enclosing Notice of Amendment and requesting he sign and return same (.3).

26738 00520SMK 02/24/97 .40 B 70.00

Telephone conference with Mr. Stewart at Bankruptcy Court regarding notices on various motions (.2); received and reviewed approved notices from Bankruptcy Court and arranged filing of same (.2).

27048 00556SMK 02/24/97 .80 B 104.00

27049 00556SMK 02/25/97 .80 B 104.00

27050 00556SMK 02/25/97 .40 B 52.00

BK000917

roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

26780 00517SAR 02/25/97 1.40 B 126.00

[REDACTED]

Prepared letter to attorney Efroymsen enclosing documentation requested (.3); finalized Certificate of Service list to include 20 largest creditors, creditor's committee, U.S. Trustee and Efroymsen (.3); ran current docket to check for any new appearances (.2); obtained copy of Service List from Bankruptcy Court and verified against current list (.2); prepared Certificate of Service for Notice of Motion to Retain Existing Bank Accounts (.2); prepared Certificate of Service for Notice of Motion for Retroactive Approval of Payment of Pre-Petition Salaries, Wages, Commissions and Employee Benefits (.2).

26786 00520SMK 02/25/97 ~~.50~~ B ~~87.50~~  
2 35.

Telephone conference with Paralegal Money regarding preparation of Certificate of Service for Notices on various Motions (.2);

[REDACTED]

[REDACTED]

[REDACTED]

Telephone conference with P. Dygert

[REDACTED]

[REDACTED] 50 B 87.50

[REDACTED] 30 B 19.50

[REDACTED] 30 B 19.50

21158 00375MBW 02/26/97 ~~9.10~~ B ~~1,683.50~~  
9 166.50

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

BK000918

coforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 23 (23)

Billing Arrangement: Hourly

[REDACTED]

(.9) [REDACTED] responded to inquiries of creditor, Vehicle Systems, regarding notices; had various discussions with Rita Stephan regarding completion of the schedules and statement of affairs and meeting with Ms. Stephan to receive the completed documents;

[REDACTED]

26847 00520SMK 02/26/97 ~~3.80~~ B 665.00  
2 35.1

[REDACTED]

[REDACTED] telephone conference with Ms. Stephan regarding issues relating to preparation of bankruptcy schedules (.2);

[REDACTED]

BK000919

roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

**Billing Attorney: Geoffrey R. Church**

Page 24 (24)

**Billing Arrangement: Hourly**

25971	00759JWM	02/26/97	.20	B	26.00
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10527

~~10500 [REDACTED] 02/27/97 .50 B 19.50~~

19529 002-0000

21190 00375MBW 02/27/97 ~~7.40~~ B ~~1,269.00~~  
4 74.-

26927	00517SAR	02/27/97	2.20	B	198.00
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[illegible]

Office conference regarding privacy of records.

~~\_\_\_\_\_~~

\_\_\_\_\_

[REDACTED]

(-4)

received, reviewed and finalized and had filed the debtor's schedules and Statement of Affairs, with copy delivered to the Trustee's Office; [REDACTED]

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

[REDACTED]

Ran current docket (2); conference had with attorney Watkins regarding whether court has issued Order Granting our Employment pursuant to our application filed on 1/31/97 (2); telephone conference with Judge Rodibaugh's law clerk to advise regarding our Application for

BK000920

reforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 25 (25)

Billing Arrangement: Hourly

Employment (.2); receipt of signed Verification for Matrix from Dave Dygert (.1); Finalized exhibits to Notice to Amend and made arrangements for same to be filed with the clerk (.3); obtained copies of exhibits for Preliminary Hearing set for 2/28/97 (.2); assisted in finalizing Statement of Financial Affairs (.3); arranged for same to be filed and copy to be hand-delivered to Alex Edgar (.2); assisted in finalizing schedules (.3); arranged for schedules to be filed and hand-delivered to Alex Edgar (.2).

26035 [REDACTED]

[REDACTED]

00351BSC 02/27/97 [REDACTED]

[REDACTED]

26036 00759JWM 02/27/97 1.50 B 195.00

Research regarding privacy of records.

00351BSC 02/27/97 [REDACTED]

[REDACTED]

BK000921



reforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

27002 00517SAR 02/28/97 2.00 B 180.00

Limited attendance at Emergency Hearing to Sell and provided copies of Statement of Financial Affairs and Schedules to attorney Church and Watkins while in Hearing (1.8); conferred with Michael Stewart regarding entry of the Order to Retain Barnes & Thornburg as Debtor's Counsel (.2).

26097 00532GR 03/01/97 2.00 B 180.00

Attorney Church and Watkins agreed to sell assets and negotiate agreed

26114 00532GR 03/01/97 2.00 B 180.00

26114 00532GR 03/02/97 1.80 B 162.00

26114 00532GR 03/02/97 2.00 B 180.00

26114 00520SRK 03/03/97 1.80 B 162.00

26114 00532GR 03/03/97 1.70 B 153.00

26114 00532GR 03/03/97 2.00 B 180.00

26114 00375MBW 03/04/97 1.20 B 108.00

[REDACTED]

BK000922

Proforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 27 (27)

Billing Arrangement: Hourly

39777 00375MBW 03/05/97 ~~3.10~~ B ~~593.50~~  
1.8 333.7

[REDACTED] conferred with  
Committee's counsel over the 341 meeting agenda  
and post-closing case administration issues; (.2)

[REDACTED]  
prepared letter to Mr. Dygert reminding of the  
upcoming 341 meeting; reviewing the schedules  
and Statement of Affairs for possible  
questioning and noting clarifications to be  
made and reviewed closing checklist with  
respect to Innkeepers requirements for release  
of its claim for closing. (.6)

.57710 00517SAR 03/06/97 .80 B 72.00

[REDACTED]  
Receipt of original signature page to the  
Agreed Order executed by attorney Lord. (.1)  
Telephone conference with Katie Pamenter  
regarding same. (.2) Telephone conference with  
Michael Stewart, the case administrator, to  
advise we have the signature page. (.2) Made

BK000923

reforma Number	164777	06/24/97
0288902	DYGERT SEATING, INC.	
0288902-000001	GENERAL	

Billing Attorney: Geoffrey K. Church

Page 28 (28)

**Billing Arrangement: Hourly**

arrangements for same to be hand delivered to Mr. Stewart. (1) Telephone conference with attorney Watkins regarding attorney Church's request he attend meeting with Flexsteel on 3/7/97 at 9:30 a.m. (2)

065203RK 03/06/91 2100

41245

40500	00375MBW	03/07/97	<del>7.00</del> B	<del>1,443.00</del>
			.5	92.50

[illegible]

~~\_\_\_\_\_~~ and received correspondence from Committee counsel requesting certain

BK000924

roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 29 (29)

Billing Arrangement: Hourly

57736 00517SAR 03/07/97 .40 B 36.00

information for purposes of the upcoming  
Section 341 meeting and retrieving copies of  
the information. (.5)

Obtained copies of original signature pages to  
the Agreed Order from attorneys O'Connor,  
Efroymsen, Van Laere, Hostetler and Alexander  
Edgar. (.1) Telephone conference with Michael  
Stewart to advise we would be sending signature  
pages to his attention. (.2) Made arrangements  
for same to be hand delivered to Mr. Stewart.  
(.1).

~~50258 00517SAR 03/07/97 .40 B 36.00~~

~~Obtained copies of original signature pages to  
the Agreed Order from attorneys O'Connor,  
Efroymsen, Van Laere, Hostetler and Alexander  
Edgar. (.1) Telephone conference with Michael  
Stewart to advise we would be sending signature  
pages to his attention. (.2) Made arrangements  
for same to be hand delivered to Mr. Stewart.  
(.1).~~

~~50258 00517SAR 03/07/97 .40 B 36.00~~

~~Obtained copies of original signature pages to  
the Agreed Order from attorneys O'Connor,  
Efroymsen, Van Laere, Hostetler and Alexander  
Edgar. (.1) Telephone conference with Michael  
Stewart to advise we would be sending signature  
pages to his attention. (.2) Made arrangements  
for same to be hand delivered to Mr. Stewart.  
(.1).~~

~~40518 00375MBW 03/10/97 3.20 B 592.00~~

~~Prepared for and attended the Sec. 341 meeting  
along with Mr. Dygert with confirmatory letters  
to Committee counsel and Mr. Dygert regarding  
additional information requested; conferred  
with Rita Stephan regarding preparation of the  
Debtor's monthly operating report; [redacted]~~

~~40518 00375MBW 03/10/97 3.20 B 592.00~~

~~Prepared for and attended the Sec. 341 meeting  
along with Mr. Dygert with confirmatory letters  
to Committee counsel and Mr. Dygert regarding  
additional information requested; conferred  
with Rita Stephan regarding preparation of the  
Debtor's monthly operating report; [redacted]~~

41339 00375MBW 03/10/97 3.20 B 592.00

2.8

518.1

(2.6) Prepared for and attended the Sec. 341 meeting  
along with Mr. Dygert with confirmatory letters  
to Committee counsel and Mr. Dygert regarding  
additional information requested; conferred  
with Rita Stephan regarding preparation of the  
(.2) Debtor's monthly operating report; [redacted]

BK000925

roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 30 (30)

Billing Arrangement: Hourly

52375 00520SMX 03/10/97 ~~88~~ B ~~140.00~~  
.2 35.-

Conferred with attorney Watkins regarding  
Section 341 meeting issues and possible motion  
to reject MSI equipment leases (.2);

~~41270 00520SMX 03/10/97 1.20 B 140.00~~

~~Conferred with attorney Watkins regarding  
Section 341 meeting issues and possible motion  
to reject MSI equipment leases (.2);~~

73631 00321RWB 03/11/97 .30 B 70.50

Telephone conference with Genie Kehr regarding  
Non Party subpoena for documents.

41354 00375MBW 03/11/97 ~~1.00~~ B ~~105.00~~  
.2 37.-

Conferred with Creditor's Committee counsel  
regarding its objection to the Innkeepers cash  
collateral agreement and the status of closing; (.2)

~~41354 00375MBW 03/11/97 1.30 B 105.00~~

~~Conferred with Creditor's Committee counsel  
regarding its objection to the Innkeepers cash  
collateral agreement and the status of closing; (.2)~~

~~41354 00375MBW 03/11/97 2.50 B 105.00~~

~~Conferred with Creditor's Committee counsel  
regarding its objection to the Innkeepers cash  
collateral agreement and the status of closing; (.2)~~

~~41354 00375MBW 03/11/97 3.00 B 105.00~~

~~Conferred with Creditor's Committee counsel  
regarding its objection to the Innkeepers cash  
collateral agreement and the status of closing; (.2)~~

~~41354 00375MBW 03/12/97 1.50 B 105.00~~

~~Conferred with Creditor's Committee counsel  
regarding its objection to the Innkeepers cash  
collateral agreement and the status of closing; (.2)~~

BK000926

Reforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

42868 00552GRC 03/12/97 2.30 B 568.00

42868 00552GRC 03/13/97 2.30 B 425.50

54875 00520SMK 03/13/97 .40 B 70.00

42868 00552GRC 03/14/97 1.40 B 259.00

[REDACTED]

[REDACTED]

[REDACTED]

Conferred with attorney Watkins regarding preparation of motion to reject M & I equipment leases (.2); revised M & I equipment leases (.2).

[REDACTED]

[REDACTED]

BK000927

Proforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

54888 00520SMK 03/14/97 1.50 B 262.50

[REDACTED]

Conferred with attorney Watkins regarding issues relating to rejection of M & I equipment leases and closing with Flexsteel (.2); conferred with attorney Church regarding same (.2); telephone conference with Mr. Langonal from M & I Leasing regarding same (.2); worked on draft of motion to reject M & I equipment leases (.9).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

00375MBW 03/15/97 3.00 B 12.00

[REDACTED]

44435 00375GKC 03/15/97 3.70 B 177.00

[REDACTED]

00375MBW 03/17/97 12.00 B 2,220.00

[REDACTED]

BK000928

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Billing Arrangement: Hourly

[REDACTED]

54908      005209MK    03/17/97    ~~5.80~~ B    ~~665.00~~  
                                       Z-2          385.-

Made revisions to motion to reject M & I equipment leases (.4); several telephone conferences with Ms. Stephan regarding Chapter 11 operating report (.5); drafted memo to attorney Efraymson regarding motion to reject equipment leases (.2);

drafted memo to attorney Van Laere regarding motion to reject M & I equipment leases (.2); received and reviewed letter from

██████████, finalized motion to reject M & I equipment leases and conferred with paralegal Money regarding filing (.4); drafted memo to attorney Church regarding motion (.2); drafted letter to attorney Efraymson regarding M & I equipment leases (.3).

44436 09/11/51 11:50 B 11-11-51

[REDACTED]

BK000929



forma Number 164777 06/24/97  
1288902 DYGERT SEATING, INC.  
1288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 34 (34)

Billing Arrangement: Hourly

15473 00375MBW 03/18/97 4.78 B 869.50  
- 4 74.50

16180 00375MBW 03/19/97 2.10 B 388.50  
1.5 277.50

certification for client regarding "employment losses".

Report in U.S. Bankruptcy Court

received the February Operating Report prepared by the debtor and made appropriate additions and clarifying comments and filed same; and received from the Committee and forwarded to the debtor for response a request for a complete preference analysis. (.4)

responded to inquiries of Innkeepers' counsel regarding the

BK000930

reforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 35 (35)

Billing Arrangement: Hourly

notice of the agreed cash collateral order and  
began outlining the report of the sale to be  
filed with the Court. (1.5)

57903 ~~00532GKC~~ ~~03/19/97~~ ~~3.10~~ B ~~245.00~~

46942 00532GKC 03/19/97 ~~3.10~~ B ~~651.00~~  
- 7 147.-

47147 00375MBW 03/20/97 ~~3.60~~ B ~~666.00~~  
3.4 629.-

~~00000~~ ~~00532GKC~~ ~~03/20/97~~ ~~50~~ B ~~000.00~~

48503 ~~00532GKC~~ ~~03/20/97~~ ~~00~~ B ~~000.00~~

4778 ~~00532GKC~~ ~~03/20/97~~ ~~00~~ B ~~000.00~~

Phone conference with D. Dygert re:  
administrative expenses and initial payment;  
phone conference with H. Efroymann re: escrow  
cut and future of Ch. 11 proceedings;

responded to inquiries of Rita  
Stephan regarding the federal withholding tax  
deposit and began preparation of the Report of  
Sale. (3.4)

BK000931

roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

48532 00532GKC 03/21/97 .40 B 84.00

73754 00321RWB 03/24/97 .30 B 70.50

~~00375MBW 03/24/97 2.80 B 518.00~~

72786 00517SAR 03/24/97 1.30 B 117.00

51365 00532GKC 03/24/97 ~~.70~~ B ~~147.00~~  
21.-

49620 00375MBW 03/25/97 ~~2.30~~ B ~~425.50~~  
148.-

Phone conferences with D. Dygert and S. Keller re: administrative expenses and agreement with Innkeepers.

Telephone conference with attorney for Steve Copp regarding Request for Production of Documents by a Non Party and advised counsel to re-issue request.

Office conference with attorney Watkins regarding Order issued stating we need to provide Notice of Final Hearing. (.2) Telephone conference with Michael Stewart to discuss bringing Notice to Clerk's Office to be signed. (.2) Met with Mr. Stewart and Katie Pamenter to review and discuss Notice and the need for a copy of the proposed Agreed Order. (.5) Additional office conference with attorney Watkins regarding meeting with Michael Stewart and Katie Pamenter regarding Agreed Order. (.2) Coordinated signature pages to Agreed Order and finalized same to be attached to Notice. (.2)

brief review of administrative expenses and bank balance.

received and reviewed cash flow and cash needs summaries from the

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72848 005178AR 03/25/97 1.00 B 90.00

company for the week of and after closing and analyzed same compared to the pre-closing (.8) estimates; [REDACTED]

51405 00532GKC 03/25/97 3.20 B 672.00

Telephone conference with Michael Stewart regarding setting final hearing date. (.2) Conference with attorney Watkins regarding same. (.2) Met with M. Stewart to obtain signed Notice to be sent out to all creditors. (.3) Oversaw mass mailing of Notice with attached proposed Agreed Order to all Creditors. (.3)

73772 00321RWB 03/26/97 .30 B 70.50

Phone conference with D. Dygert re: cash position, unpaid expenses and additional receipts due; open escrow account; letter to R. Efroymsen re: same.

Telephone conference with Genie Kehr at Dygert regarding prior telephone conference with attorney for Steven Copp regarding Request for Production of Documents.

57056 00531BJC 03/26/97 .20 B 36.00

Reviewed potential COBRA issues re: bankruptcy and termination of plans.

53387 00532GKC 03/26/97 .60 B 126.00

[REDACTED]

[REDACTED]

Reviewed documentation received from [REDACTED]

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~~554002 00517SAR 03/27/97 .30 B 19.50~~

572984 00517SAR 03/27/97 .70 B 63.00

~~557110 00517SAR 03/27/97 2.00 B 420.00~~

~~561002 00517SAR 03/27/97 2.00 B 420.00~~

555089 00375MBW 03/28/97 ~~3.40~~ B ~~629.00~~  
2.2 407.~

573043 00517SAR 03/28/97 .20 B 18.00

~~573043 00517SAR 03/28/97 .20 B 18.00~~

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Obtained current docket. (.2) Review of docket to update Certificate of Service. (.2) Updated same. (.3)

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(.2)

conferred with counsel for PlyFoam regarding his inquiries concerning the background of the Innkeepers cash collateral agreement and the intended disposition of the case; reviewed the cash flow analysis as to remaining cash as compared to administrative expenses to be paid out of same; with memorandum to Mr. Dygert regarding same; (.7) received letter from Creditor's Committee inquiring as to various items reflected in the February Operating Report and began preparation of a response to each of the inquiries; (.9) conferred with Rita Stephan to answer certain of the questions and advised US Trustee of error in the Operating Report noted by Committee's counsel. (.4)

Telephone conference with Michael Stewart regarding status of our Motion to Reject Leases.

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~~00532GKC 03/29/97 1.00 B 370.00~~  
~~00375MBW 03/31/97 2.00 B 370.00~~

~~00532GKC 03/31/97 1.00 B 370.00~~

~~00532GKC 03/31/97 1.00 B 370.00~~

~~00532GKC 04/01/97 1.00 B 370.00~~

73528 00375MBW 04/01/97 1.70 B 314.50

76366 00531BJC 04/01/97 .90 B 162.00

76375 00532GKC 04/01/97 ~~1.60~~ B ~~336.00~~

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84.-

~~00532GKC 03/29/97 1.00 B 370.00~~  
~~00375MBW 03/31/97 2.00 B 370.00~~

~~00532GKC 03/31/97 1.00 B 370.00~~  
~~00375MBW 03/31/97 2.00 B 370.00~~

~~00532GKC 03/31/97 1.00 B 370.00~~  
~~00375MBW 03/31/97 2.00 B 370.00~~

~~00532GKC 03/31/97 1.00 B 370.00~~

~~00532GKC 04/01/97 1.00 B 370.00~~  
~~00375MBW 04/01/97 1.70 B 314.50~~

- (.6) Updated and finalized letter responding to various inquires of counsel to the Creditor's Committee regarding the status of the closing and certain information in the Operating Report; received from Committee's counsel and reviewed sample creditor plan as possible means for disposing of the case; and prepared letter to Mr. Dygert with suggested format for preparation of the preference analysis. (.7)

Reviewed COBRA issues and letter to beneficiaries.

~~00532GKC 03/31/97 1.00 B 370.00~~  
~~00375MBW 03/31/97 2.00 B 370.00~~

phone  
conference with NBD Insurance re: refund;  
conference with B. Clark re: COBRA issues;

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34092	00748CMB	04/01/97	.80	B	68.00
93474	00756CMK	04/01/97	1.90	B	247.00
73545	00375MBW	04/02/97	.20	B	37.00
76404	00532GKC	04/02/97	<del>.80</del> 1.3	B	<del>189.00</del> 63.00
76545	00375MBW	04/03/97	.20	B	37.00
76338	00136SPM	04/04/97	.40	B	36.00
					27.00
					252.00
77443	00136SPM	04/07/97	.40	B	36.00

phone conference with Theresa re: same; phone conference with J. O'Connor.

Researched COBRA coverage upon bankruptcy and sale of assets and sent information to Brian Clark.

Prepared biennial report form.

Received additional inquiries from counsel to the Creditor's Committee regarding the various alternative means of disposing of the case once the closings are fully completed and accounted for.

~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~ memo to S. Merchant with biennial report; ~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~ conference with J. Stringfellow re: preparation and processing claims.

Responded to further inquiries from PlyFoam counsel about the separate assets and real estate closings and the prospects for a dismissal of the case as opposed to a liquidating plan preferred by the Committee.

Reviewed 1997/1998 annual report and submitted same to the Secretary of State of Indiana and resubmitted Articles of Amendment to be filed immediately after.

~~\_\_\_\_\_~~  
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~~\_\_\_\_\_~~  
Reviewed filed stamped copy of 1997/1998 annual report and forwarded same to Church; reviewed rejection of the Articles of Amendment changing the name Dygert Seating to DPD, Inc. because the name is similar to a name already in existence; accessed, printed and reviewed material from the Indiana Secretary of State Corporation database and forwarded same and rejection papers to Church.

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2000 00000000 06/24/97 5.80 B 705.00

7985 00375MBW 04/09/97 .90 B 166.50  
18.50

1119 00136SPM 04/14/97 .30 B 27.00

1455 00532GKC 04/14/97 .10 B 21.00

3523 00756CMK 04/14/97 .40 B 52.00

1708 00375MBW 04/15/97 .40 B 74.00

[REDACTED]

[REDACTED]

(.) discussing  
with Rita Stephan  
progress in completing the preference analysis  
and the March Operating Report  
conferred with Committee's counsel  
[REDACTED]

Conferred with Chris Kelly re checking the  
availability of the name of DSI, Inc. on the  
Secretary of State of Indiana database and  
accessed, printed and reviewed material from  
same; reported results of investigation to  
Chris Kelly (name is not available).

[REDACTED]

Conference with C. Kelly re: Articles of  
Amendment.

Prepared Articles of Amendment.

Responded to various inquiries of Rita Stephan  
regarding preparation of the March Operating  
Report and as to the closing related  
information requested by Committee's counsel.

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93536	00756CMK	04/15/97	.50	B	65.00
33652	00375MBW	04/16/97	<del>2.70</del> .7	B	<del>499.50</del> 129.50
98172	00517SAR	04/16/97	.20	B	18.00
98181	00520SMK	04/16/97	1.40	B	245.00
12813	00532GKC	04/16/97	.30	B	63.00
<del>00532GKC 04/17/97 1.70 B 117.00</del>					
13830	00375MBW	04/17/97	2.40	B	444.00
3978	00517SAR	04/17/97	.60	B	54.00
8242	00520SMK	04/17/97	.30	B	52.50
<del>00532GKC 04/17/97 1.70 B 117.00</del>					

Letter to client; prepare Articles of Amendment.

~~\_\_\_\_\_~~  
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~~\_\_\_\_\_~~; received draft of March Operating Report from Rita Stephan, noting changes and corrections to be made and advising Rita of same and received the revised pages and prepared same for filing;  
~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~

(.7)

Arranged for filing of the Monthly Financial Report.

Telephone conference with Mr. Stewart at Bankruptcy Court regarding form of orders for pending motions (.2); drafted form of order for pre-petition bank account motion (.7); drafted form of order relating to pre-petition wages, salaries and employee benefits motion (.5).

Review M. Watkins memo and draft response; phone conference with M. Watkins re: same.

~~\_\_\_\_\_~~  
Continued analysis of the reports prepared by Rita Stephan detailing all of the payments made by DSI since the closing and description of each and the updated cash statement and conferred with Rita regarding various items of the cash report and began preparation of further alternative analysis of same to present to the Committee to show the benefit of the closing process.

Prepared Certificate of Service for Monthly Finance Report. Arranged for filing of report and Certificate of Service. Oversaw mass mailing of Notice sent out regarding the equipment leases.

Received and reviewed materials from Mr. Stewart at Bankruptcy Court regarding notice of motion to reject equipment leases and conferred with paralegal Money regarding same.

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93559	00756CMK	04/17/97	.30	B	39.00
<del>93559</del>	<del>00756CMK</del>	<del>04/17/97</del>	<del>.30</del>	<del>B</del>	<del>39.00</del>
35313	00375MBW	04/18/97	5.30	B	980.50
35169	00532GKC	04/18/97	.20	B	42.00
35330	00375MBW	04/21/97	.80	B	148.00
16687	00375MBW	04/22/97	.50	B	92.50
<del>7059</del>	<del>00532GKC</del>	<del>04/22/97</del>	<del>.20</del>	<del>B</del>	<del>42.00</del>
7298	00375MBW	04/23/97	.50	B	92.50
2272	00375MBW	04/24/97	.20	B	37.00
8691	00520SMK	04/25/97	.30	B	52.50

~~Letter to client regarding name change of corporation.~~

Continued analysis of the efforts to reconcile cash and disbursement statements in order to provide the Committee the closing and post-closing data requested with various discussions with Rita Stephan as to the financial data to assist in the reconciliation and prepared draft of letter to Committee counsel to relay this information.

Review draft response to Atty. Efreyson; phone conference with M. Watkins.

Continued preparation of alternate closing analysis to show how the estate has benefited by the closing process and finalizing draft of a letter to the Committee explaining same and forwarding a copy of this letter to Rita Stephan for review and comment.

(.2) Received and responded to letter from Committee's counsel concerning the post-closing cash distributions and received and reviewed the preference analysis with further discussions with Rita Stephan about the distribution analysis.

Continued review of the alternate forms of the preference analysis and conferring with Rita Stephan about the manner in which it was prepared and detail supporting the analysis.

Conferred with Rita Stephan regarding the liability for the personal property bills just received.

Received and reviewed Order Granting Motion to Retain Existing Bank Accounts and Order Granting Motion for Approval of Payment of Certain Pre-Petition Salaries, and Employee Benefits and drafted memo to Dave Dygert regarding same.

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92333 00375MBW 04/29/97 1.50 B 277.50

Began preparation of letter to Committee counsel forwarding the preference analysis and check and invoice detail and further began finalizing correspondence and analysis regarding the post-closing cash disbursements and remaining cash and payable analysis and received letter from NBD's counsel detailing the components of its final claim amount. (1.3)

98912 00375MBW 04/30/97 1.10 B 203.50

Received additional information from Rita as to the status of the outstanding employee health claims and conferred with Rita regarding the accuracy of the cash balance in the NBD operating account reported by NBD to the Committee; finalized letter and sent to the Committee the preference analysis prepared by the Company and continued the post-closing cash disbursements analysis. (.8)

99020 00375MBW 05/01/97 .90 B 166.50

(.4) Met with attorney Lutkus to discuss completion of the Workforce Development Form required with respect to Flexsteel's purchase of the operations and criminal penalties for failure to file, with letter to Rita Stephan regarding same and reviewed letter from the Committee's counsel to NBD's counsel for financial information and continued analysis and reconciliation of post-closing disbursements. (.5)

23662 00516GFL 05/01/97 .70 B 140.00

Conduct research on question regarding failure to fill out Work Force Development forms in connection with sale; confer with Michael B. Watkins regarding potential penalties.

10468 00375MBW 05/02/97 .80 B 148.00

Began final revisions of letters to Committee counsel forwarding updated post-closing cash disbursement information and analysis of remaining cash and claims.

13327 00375MBW 05/05/97 1.50 B 277.50

(1.1) Finalized and forwarded to Committee's counsel the post-closing cash distribution and payables analysis and conferred with Committee's counsel regarding the preference analysis and pursuit of same and had discussions with Mr. Dygert regarding same and regarding pursuit of the arbitration of the Master Van account and advising Innkeepers' counsel regarding same as it is now Innkeepers' right to pursue this claim. (.4)

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.2524	00532GKC	05/05/97	.10	B	21.00
.4522	00532GKC	05/08/97	.10	B	21.00
11647	00321RWB	05/10/97	.30	B	70.50
.4822	00375MBW	05/12/97	1.20	B	222.00

Phone conference with M. Watkins. re: administrative expenses

Reviewed letter from M. Watkins. re: administrative expenses

Receipt of subpoena duces tecum from attorneys for Steven Copp requesting that Dygert produce personnel file of Jeannette Barhams.

(.2) Conferred with Committee's Counsel regarding payment sources for payment of unpaid administrative claims and conferred with Mr. Dygert regarding request of employees to submit claims for unpaid health plan claims and began preparation of letter to Mr. Dygert to forward claims with explanation as to completing and filing the claims. (1.0)

~~6145 00532GKC 05/12/97 .20 B 42.00~~

4897 00375MBW 05/13/97 2.10 B 388.50

(.5) Conferred with Rita Stephan on various occasions regarding cash balances, employee health claims and preparation of the April operating report, finalized and forwarded to Mr. Dygert letter addressing unpaid employee health benefits as priority and administrative expenses along with proof of claim and application for payment of administrative expense forms. (1.6)

4651 00517SAR 05/13/97 .20 B 18.00

Obtained copy of Notice giving dates for Proof of Claim to be filed and provided same to attorney Watkins.

2922 00520SMK 05/13/97 .30 B 52.50

Telephone conference with attorney Church regarding fee application issues and drafted memo to attorney Church regarding fee application guidelines and forms.

~~6154 00532GKC 05/13/97 .20 B 42.00~~

~~6158 00532GKC 05/11/97 .20 B 42.00~~

8151 00375MBW 05/15/97 .30 B 55.50

Retrieved at the request of the creditor, the notice of commencement and the order appointing debtor in possession entered at the initial stages of the case.

4695 00517SAR 05/15/97 .80 B 72.00

Obtained copy of current docket. (.2); reviewed docket and had discussion with attorney Watkins regarding the notice for Section 341 meeting.

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4021 00375MBW 05/21/97 .80 B 148.00

(.2); telephone conference with the clerk's office. (.2); arranged for copy of the Section 341 meeting notice to be picked up from the clerk's office. (.2).

Received, reviewed and prepared for filing the April operating report and reviewed the updated cash balance and disbursement statement; (.3) conferring with Rita Stephan regarding same; (.1) reviewed the letter to Flexsteel seeking a refund of monies paid in error under the purchase agreement; conferring with Mr. Dygert regarding same; received letter from Committee's counsel requesting the debtor to pursue NBD and the insiders for the funds needed to pay remaining administrative expenses and conferring with Mr. Dygert regarding same and regarding the payment of unpaid administrative claims, particularly environmental matters and further discussed NBD's suggestion to convert the case to Chapter 7, discussing the implications of same. (.4)

Arranged for filing of the monthly report.

Reviewed letter from creditors committee counsel and proof of claim.

4803 00517SAR 05/21/97 .20 B 18.00

7339 00532GKC 05/21/97 .20 B 42.00

~~5500 00375MBW 05/22/97 .30 B 19.50~~

4028 00375MBW 05/22/97 .20 B 37.00

Advised legal assistant Ms. Money regarding service of the April Operating Report and conferred with attorney Church regarding the alternative proposals being received for the ultimate disposition of the case.

4830 00517SAR 05/22/97 .30 B 27.00

Prepared a Certificate of Service, serving file marked copies of the monthly financial report to appropriate parties and arranged for filing of same.

7368 00532GKC 05/22/97 .30 B 63.00

Phone conferences with D. Dygert and M. Watkins re: open issue in Ch. 11 proceedings.

~~5506 00375MBW 05/23/97 .30 B 19.50~~

4045 00375MBW 05/23/97 .40 B 74.00

Had discussions with Mr. Dygert over payment issues and reviewed information sent by Rita Stephan regarding tax return preparation and other accountant issues.

2178 00321RWB 05/27/97 .30 B 70.50

Telephone conference with Genie Kehr at Dygert

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28106 00375MBW 05/29/97 4.40 B 814.00

Prepared for and attended lengthy meeting with Mr. Dygert and attorney Church discussing the current status of the cash in the estate, additional monies owed the estate and prospects for recovery of same, the remaining administrative expenses owing and other claims against the estate; discussed alternate sources of recovery on certain employee health claims; discussed finalizing the open post closing issues with Flexsteel and Innkeepers; discussed the preference analysis and likely collectibility of the preferences; discussed alternate methods of disposing of the case among the creditor plan proposed by the Committee, dismissal, conversion and a liquidation plan and the implications and advantages and disadvantages of each; allocated work responsibilities on these remaining matters and reviewing updated financial, cash disbursement and payables lists prepared by Dygert.

3.2

1.2

31050 00532GKC 05/29/97 ~~3.00~~ B ~~798.00~~  
3.2 672.00

Prepare for and attend conference with D. Dygert and M. Watkins to discuss all unresolved Chapter 11 items; [REDACTED]

28134 00375MBW 05/30/97 1.00 B 185.00

Prepare a checklist of work allocation of the remaining open issues to be resolved in order to dispose of the case.

31104 00531BJC 05/30/97 1.00 B 180.00

Reviewed form 5500; reviewed delinquent file program; reviewed exemptions to 5500; reviewed application of penalties.

31114 00532GKC 05/30/97 .40 B 84.00

Letter to D. Dygert with G. Lord demand to remove barrels at Goshen facility; revise letters; review letter re: 5500's; phone conference with M. Watkins; phone conference with D. Dygert re: paying costs for barrel removal.

45020 00375MBW 06/02/97 .50 B 92.50

Had lengthy discussions with counsel for the Committee regarding status of unpaid administrative expenses and demand that the debtor pursue same from the secured creditors as well as pursue preferences and discussing status of collections by Flexsteel on accounts which are partly payable to Innkeepers; further receiving correspondence from NBD's counsel regarding claims being filed.

46778 00531BJC 06/02/97 .20 B 36.00

Reviewed failure to file 5500 situation.

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46790 00532GKC 06/02/97 .10 B 21.00

Phone conference with Rita re: more information needed on LCM collection.

45033 00375MBW 06/03/97 2.40 B 444.00

Began preparation of the papers to retain McGladrey & Pullen as the debtor's accountants, including retention application, affidavit of Timothy Frick and form of order, with memo to attorney Church to forward same to Timothy Frick for completion and signature and further addressing certain of the matters handled by the accountants during the proceeding.

46800 00532GKC 06/03/97 .50 B 105.00

Phone conference with D. Dygert re: Georgia Phase I payment; research re: mechanics lien; phone conference with M. Watkins; phone conference with Rita.

46801 00532GKC 06/03/97 .20 B 42.00

Phone conference with E. Chester re: lawsuit against Innkeepers for sales commission after sale to Dygert and need for affidavit from David.

47323 00375MBW 06/04/97 1.20 B 222.00

Received from Rita Stephan notice of personal property tax assessment by Osolo Township and prepared letter to the Assessor regarding same; (.5) received letter from environmental firm conducting barrel removal from the Georgia plant threatening to file mechanic lien for unpaid post-petition clean up charges; (.2) completed drafts of the retention papers for McGladrey & Pullen as the debtor's accountants; (.4) received additional employee proofs of claim and conferred with Flexsteel's counsel regarding refund owing the debtor on pre-closing receivables collections. (.3)

47343 00764TMW 06/04/97 .50 B 35.00

Initiated research into bankruptcy law regarding administrative expenses both pre and post-conversion.

~~47343 00764TMW 06/04/97 .50 B 35.00~~

~~Administrative expenses both pre and post conversion; research; review of \$42,800 overpayment made by Dygert Seating on 4/21/97; phone conference with Rita Stephan to confirm details; conference with D. Dygert re: same; review arguments re: Goshen lease and barrel removal issue; research.~~

46817 00532GKC 06/05/97 1.90 B 399.00

Review of \$42,800 overpayment made by Dygert Seating on 4/21/97; phone conference with Rita Stephan to confirm details; conference with D. Dygert re: same; review arguments re: Goshen lease and barrel removal issue; research.

47373 00764TMW 06/05/97 1.80 B 126.00

Researched administrative expenses and post conversion priority of preconversion

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Item Number	Code	Date	Hours	Rate	Amount	Description
47391	00375MBW	06/06/97	4.60	B	851.00	administrative expenses; began drafting findings.
19099	00532GKC	06/06/97	.50	B	105.00	Continued revision to and finalization of the Report of Sale, including cash receipt and disbursement history and identity of unpaid administrative expenses and prepared initial draft of motion to fix bar date for the filing of administrative claims and received correspondence regarding the payment of the Georgia environmental barrel removal charges.
17410	00764TMW	06/06/97	<del>2.00</del>	B	<del>140.00</del>	Review M. Watkins memo and items to discuss with Dave; phone conference with D. Dygert; letter from D. Davis.
17940	00375MBW	06/09/97	<del>3.30</del> 2.4	B	<del>610.50</del> 536.50	Completed research on Section 503 administrative expenses and refiling claims after conversion; drafted findings in memoranda of law.
54859	00517SAR	06/09/97	.30	B	27.00	(1.1) Finalized <del>draft of Report of Sale and</del> Motion to Fix Bar Date for Filing Administrative Claims and prepared draft of the debtor's response to the Committee's demand letter; reviewed recent case on the retention of accountants who were owed pre-petition bills and correspondence with attorney Church regarding same and regarding employee proofs of claim and administrative claims being filed and status of same upon conversion.
19126	00532GKC	06/09/97	<del>1.20</del> .9	B	<del>252.00</del> 189.-	(1.4) Obtained current copy of docket sheet from PACER system and reviewed same to see if there were any objections to our Motion to Reject Equipment Leases and advised attorney Watkins there were no objections.
17973	00764TMW	06/09/97	<del>1.30</del>	B	<del>21.00</del>	<del>_____</del> <del>_____</del> ; phone conference with M. Watkins re: employee health claims; phone conference with D. Dygert re: Flexsteel position on repayment and Goshen situation; phone conference with J. O'Connor; letter to J. O'Connor; research.
18726	00375MBW	06/10/97	.50	B	92.50	(.3) Made final revisions and corrections to memoranda concerning priority of converted Chapter 11 administrative expenses.

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68262 00520SMK 06/10/97 .50 B 87.50

49141 00532GKC 06/10/97 3.30 B 693.00

9779 00375MBW 06/11/97 ~~2.70~~ B ~~199.50~~  
1.8 333.-

884 00517BAR 06/11/97 .20 B 18.00

328 00520SMK 06/11/97 .20 B 35.00

104 00532GKC 06/11/97 .80 B 168.00

52 00375MBW 06/13/97 ~~1.80~~ B ~~333.00~~  
1.3 240.50

(.2) from the former Goshen operations; reviewed research on status of Chapter 11 administrative claims in a converted case.

Drafted form of order granting debtor authority to reject certain equipment leases.

Review M. Watkins memo and all attachments; phone conference with D. Dygert; review Court Order and G. Lord demand letter; draft response to G. Lord; phone conference with M. Watkins.

(.3) Had further discussions with attorney Church regarding Innkeepers' demand for clean up and barrel removal at the Goshen facilities and the Debtor's inability to pay for same and further discussed expediting the conversion of the case to Chapter 7 and began preparing Motion and  
(.1) ~~further discussions~~ and conferred extensively with attorney Hostetler over the Debtor's plans to convert the case and the various employee health claims being sent to NBD.  
(.4)

Arranged for filing of Order re: Motion to Reject Equipment Leases.

Revised and finalized form of order.

Phone conference with S. Hostetler re: Creditors Committee action and claims; phone conference with M. Watkins re: same and response to Creditors Committee; phone conference with S. Hostetler; phone conference with M. Watkins.

(.3) ~~Final Report of Sale and Distribution~~  
~~Final Report of Sale and Distribution~~  
~~Final Report of Sale and Distribution~~  
~~Final Report of Sale and Distribution~~  
~~Final Report of Sale and Distribution~~  
(.3) the motion to set bar date for administrative claims; continued preparation of motion to convert to Chapter 7; had discussions with Committee's counsel and NBD's counsel regarding debtor's intentions in disposing of the case and conferred with Mr. Dygert regarding the various claims being filed by employees for

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651834 00532GKC 06/13/97 1.20 B 252.00

(.7) health cost reimbursement and conferred with attorney Church regarding the timing of the conversion to best assist the trustee.

Phone conference with D. Dygert; finalize letter to G. Lord; phone conference with G. Lord; phone conferences with M. Watkins re; conversion and items to be completed first; revise accountant's petition; letter to T. Frick re: same.

551199 00375MBW 06/16/97 1.70 B 314.50

Completed draft of the Motion to Convert the case to chapter 7 and accompanying notice and form of order and made accompanying revisions to motion to fix bar date for administrative claims.

552677 00532GKC 06/17/97 .50 B 105.00

Conference with T. Frick re: petition; revise same.

68679 00520SMK 06/19/97 .10 B 17.50

Received and reviewed Order Granting Motion for Rejection of Equipment Leases.

56204 00375MBW 06/23/97 2.40 B 444.00

(.3) Conferred with Rita Stephan regarding the latest proposed Operating Report and clarifying changes to be made and received and reviewed the Committee's motion to force the debtor to pursue a §506(c) action against the debtor's secured creditors and began preparing draft of response to same.

(2.1)

58376 00532GKC 06/23/97 2.30 B 483.00

Began review of time records for preparation of Petition for Fees; memo to M. Watkins; review and revise Creditor Committee Motion to Compel; phone conference with M. Watkins; phone conference with G. Gaskill re: waste removal in Goshen.

56216 00764TMW 06/23/97 ~~1.30~~ B ~~91.00~~

Researched issues involving who has standing to bring actions under the Bankruptcy Code Section 506(c); reviewed initial findings and recent cases.

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657325 00375MBW 06/24/97 .60 B 111.00

Received and reviewed the objection by NBD Bank to the Committee's 506(c) motion and discussed same with NBD's counsel and instructed research associate to research issues concerning the Committee's standing in this regard.

658416 00532GKC 06/24/97 .80 B 168.00

Memo to M. Watkins with McGladrey & Pullen petition; phone conference with T. Frick; phone conference with D. Dygert re: waste removal; letter to D. Dygert with copy of Creditors Committee's Motion to Compel.

657357 00764TMW 06/24/97 ~~2.70~~ B ~~169.00~~

Researched primary and secondary sources as well as case law concerning liability under 11 U.S.C. Section 506(c) to pay attorney fees by secured creditors.

558575 00375MBW 06/25/97 3.60 B 666.00

(.2) Received and prepared for filing the application to employ McGladrey & Pullen, nunc pro tunc, as the debtor's accountants; prepared initial draft of the debtor's response to the Committee's motion to compel, including discussions with research associate on the standing issue and received and organized for filing replacement pages to the debtor's May Operating Report.

669002 00517SAR 06/25/97 .50 B 45.00

Arranged for monthly report to be filed with Bankruptcy Clerk and served. Prepared Certificate of Service. Office conference with attorney Watkins regarding filing Application for Order Authorizing Retention Nunc Pro Tunc, of accountant by the Debtor-in-Possession on 6/26/97.

60461 00532GKC 06/25/97 1.10 B 231.00

Review items to be completed before conversion; memo re: same; phone conference with M. Watkins; phone conference with D. Dygert; revise letter to ISBS for Dave.

60698 00764TMW 06/25/97 ~~3.60~~ B ~~253.00~~

Researched applicable case law on standing and 506(c) Motions; conducted research on Bankruptcy Rule 1103(c)(5) and official

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committees performing other services for other  
creditor committees.

2659845 00375MBW 06/26/97 2.80 B 518.00

(2.6)

Finalized draft of the debtor's response to the  
Committee's § 506 motion, including research on  
the standing issue and incorporating same into  
the agreement and conferred with Rita Stephan  
regarding inquiry about Georgia unemployment  
taxes.

2669080 00517SAR 06/26/97 .20 B 18.00

Arranged for filing of Application for Order  
Authorizing Retention Nunc Pro Tunc of  
Accountant by the Debtor-in-Possession and  
served same; arranged for filing Certificate of  
Service for filing of Monthly Report on June  
25.

2660491 00532GKC 06/26/97 1.00 B 210.00

Letter from G. Lord re: attempted removal of  
compactor; phone conference with D. Dygert re:  
same and re: barrel removal; phone conference  
with G. Lord; letters to G. Lord re: same;  
phone conference with D. Dygert; phone  
conference with M. Watkins.

2660733 00764TMW 06/26/97 ~~1.50 B~~ ~~105.00~~

Continued research on the powers and duties of  
committees in Chapter 11; researched the issue  
of who has standing to bring a claim on behalf  
of the various committees in a Chapter 11.

2660739 00375MBW 06/27/97 2.10 B 388.50

(.8)

Began revisions to draft of the Objection to  
the Committee's §506(c) Motion to add portions  
pleading in the alternative that if the court  
grants the Committee's Motion, Dygert be  
permitted to pursue the actions; began  
preparation of the fee application; further  
researched the standing issue under the §506(c)  
Motion.

(1.0)

(.3)

2662787 00375MBW 06/30/97 2.80 B 518.00

(.4)

(.4)

Finalized revised draft of the debtor's  
response to the Committee's § 506(c) Motion to  
compel; received and responded to  
correspondence from the trustee regarding  
additional quarterly fees owing and began continued  
preparation of the final application for fees  
and reimbursement of expenses.

2677986 00532GKC 06/30/97 .10 B 21.00

(.2)

Review correspondence for US Trustee in  
underpayment of fee; memo to M. Watkins.

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Item Number	Code	Date	Hours	Rate	Amount	Description
2677987	00532GKC	06/30/97	.30	B	63.00	Review response to creditors committee; Dygert re: band removal.
2669365	00764TMW	06/30/97	<del>2.30</del>	<del>B</del>	<del>161.00</del>	Researched cases in which an unsecured creditors committee was authorized to bring an action and the reasoning behind said authorization.
2669372	00375MBW	07/01/97	2.20	B	407.00	(.1) Received the order scheduling a hearing on the Committee's § 506(c) Motion; conferred with Innkeepers counsel regarding the Order (.2) Approving the Report of Sale regarding the Plyfoam assigned receivable and continued preparation of the first and final fee application. (1.9)
2678727	00375MBW	07/02/97	1.80	B	333.00	(.2) Reviewed the motion of Innkeepers for supplemental sale order approving the debtor's assignment of the "Plyfoam receivable" to Innkeepers; reviewed additional case law on issue of standing of the Creditors' Committee to pursue § 506(c) actions for administrative claimants and continued preparation of the fee application. (.4) (1.2)
2683504	00764TMW	07/02/97	<del>2.70</del>	<del>B</del>	<del>161.00</del>	Completed research on committee standing to bring causes of action; researched Section 1103(b) actions concerning attorneys employed by committees and what constitutes adverse interest to the same.
2682480	00375MBW	07/03/97	.60	B	111.00	Continued preparation of the fee application separating the detail into the project categories.
702299	00517SAR	07/07/97	.30	B	27.00	Assisted in preparation of fee application.
683282	00532GKC	07/07/97	.10	B	21.00	Receive Motion from G. Lord; letter to D. Dygert.
686449	00532GKC	07/11/97	.20	B	42.00	Phone conference with D. Dygert re: repayment by Flexsteel of erroneous prior payment by Dygert.
717892	00746TDK	07/14/97	.50	B	70.00	Review small claims complaint; conference with Geoff Church; calls to Dave Dygert and Rick Davis.
690491	00375MBW	07/20/97	1.50	B	277.50	Reviewed court's order setting hearing on

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Invoice Number	Client	Date	Hours	Rate	Amount	Description
2715737	00517SAR	07/21/97	.40	B	36.00	Innkeepers motion to clarify sale order and order appointing accountants nunc pro tunc. (.2) Continued preparation of fee application. (.6) Reviewed correspondence from Rita Stephan regarding DIP tax return issues and employee insurance coverage under new employer pursuant to recent federal legislation with letter to Ms. Stephan regarding same. (.4) Finalized and prepared for filing debtor's response to the Committee's Motion to compel debtor to undertake § 506(c) action. (.3)
2690507	00375MBW	07/22/97	.20	B	37.00	Filed Objection to Motion to Compel and served same.
2715765	00517SAR	07/22/97	.20	B	18.00	Conferred with and advised Rita Stephan as to accounting for contingent expense relating to environmental charge at Goshen facilities and discussed debtor's recovery of cash refunds from Flexsteel and NBD Bank.
2701767	00531BJC	07/22/97	1.80	B	324.00	Office conference with attorney Watkins regarding assisting in preparing fee application.
2690971	00532GKC	07/22/97	.30	B	63.00	Review tax return filing requirements on 1120 and 5500's on health plan.
2691201	00375MBW	07/23/97	.70	B	129.50	Conferences with B. Clark re: tax returns and time to file.
						Received and reviewed the June Operating Report and discussing questions with Rita Stephan (.3) and continued preparation of the fee application. (.4)
2691222	00375MBW	07/24/97	2.00	B	370.00	Made final preparations for and attended and presented argument in opposition to the Committee's motion to compel the debtor to investigate § 506(c) action against the secured creditors, arguing instead for a Chapter 7 trustee to pursue this action and other possible recoveries and also attended hearing on Innkeeper's Motion for the Court to clarify the sale order regarding the Plyfoam claim assignment to Innkeepers.
2715787	00517SAR	07/24/97	.20	B	18.00	Arranged for filing of monthly report.
2701815	00531BJC	07/24/97	.20	B	36.00	Worked on tax return issues.

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2694124 00375MBW 07/28/97 .10 B 18.50 Responded to Flexsteel's inquiries about the hearing on the Committee's \$ 506 motion to compel.

2715819 00517SAR 07/28/97 .30 B 27.00 Prepared Certificate of Service for monthly report and arranged for filing of same.

2701888 00532GKC 07/28/97 .10 B 21.00 Phone conference with M. Watkins re: status and time to convert; phone conference with Atty. Weldy re: affidavit.

2701951 00532GKC 07/30/97 .30 B 63.00 Phone conference with A. Weldy re: agreement Innkeepers filed as a result of 1995 acquisition and request of plaintiff for 1) Dygert to sign affidavit; letter to D. Dygert re: same.

00000 \*\* Phase Total \*\*

Total Fees

MISCELLANEOUS

Time Entries Excluded Because of Date Range

Total Time Value in Work in Progress

Other Charges:

Index	Attorney	Date	Stat	Code	Quant	Amount	Description	Check #
01990107	00532 GKC	01/24/97	B	108	00001	-25,000.00	Check received from Dygert Seating	
01990099	00532 GKC	01/29/97	B	108	00001	-24,197.65	Check received from Dygert for Trust	
01989076	00532 GKC	01/31/97	B	099	00001	49,197.65	Other/Misc. Charges - Barnes & Thornburg Acct.	68158
02017927	00532 GKC	02/01/97	B	002	00001	10.00	Messenger Courier Service	
02017934	00532 GKC	02/01/97	B	002	00001	10.00	Messenger Courier Service	
02017935	00532 GKC	02/01/97	B	002	00001	10.00	Messenger Courier Service	
02017930	00532 GKC	02/01/97	B	002	00001	10.00	Messenger Courier Service	
02017936	00532 GKC	02/01/97	B	002	00001	10.00	Messenger Courier Service	
02029084	00532 GKC	02/01/97	B	002	00001	10.00	Messenger Courier Service	
02029111	00532 GKC	02/01/97	B	002	00001	10.00	Messenger Courier Service	
02029607	00532 GKC	02/01/97	B	020	00001	3.00	Binding Charges	
02029115	09999 firm	02/01/97	B	002	00001	10.00	Messenger Courier Service 288900.25	
02006166	00520 SMK	02/03/97	B	002	00001	14.96	Mileage to Elkhart, IN to attend meeting with Geoff Church and Dave Dygert - Scott M. Keller	3203*
02001096	00532 GKC	02/03/97	B	015	00001	10.29	Courier Service - United Parcel Service	68213
02006167	00532 GKC	02/03/97	B	002	00001	10.00	Messenger Courier Service	
02020324	09999	02/20/97	B	102	00001	1.25	Valo/Spiral Binding	
02026036	00136 SPM	02/24/97	B	002	00001	10.00	Messenger Courier Service	
02026037	00136 SPM	02/25/97	B	002	00001	10.00	Messenger Courier Service	
02026038	00532 GKC	02/25/97	B	099	00001	6.96	Other/Misc. Charges - Indiana Secretary of State	193193
02026039	00532 GKC	02/25/97	B	099	00001	6.96	Other/Misc. Charges - Indiana Secretary of State	68461

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EXHIBIT C

288902            DYGERT SEATING, INC.  
000001            GENERAL - Cash Collateral

TIME SUMMARY BY ATTORNEY

	<u>Attorney</u>	<u>Hours</u>	<u>\$/Hour</u>	<u>Charge</u>
00136	SPM     S. Merchant	0.00		
00321	RWB     R. Benko	0.00		
00343	MAJ     Courier-SB		65.00	NONE
00375	MBW     M. Watkins	21.60	185.00	3,996.00
00516	GFL     G. Lutkus	0.00		
00517	SAR     S. Money	3.90	90.00	351.00
00520	SKM     S. Keller	32.70	175.00	5,722.50
00531	BJC     B. Clark	0.00		
00532	GKC     G. Church	1.60	210.00	336.00
00545	MJA     M. Adey	0.00		
00548	CMB     C. Benedict	0.00		
00746		0.00		
	T. Knox	0.00		
00756	CMK     C. Kelly	0.00		
00759	JWM     J. Maciejczyk	0.00		
	TOTAL	59.80		10,405.50



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\*\*\*\*\* MATTER BILLING ADDRESS \*\*\*\*\*  
0288902 DYGERT SEATING, INC.  
ATTN: MR. DAVE DYGERT  
P.O. BOX 847  
ELKHART, IN 46515

\*\*\*\*\* CLIENT BILLING ADDRESS \*\*\*\*\*  
DYGERT SEATING, INC.  
ATTN: MR. DAVE DYGERT  
P.O. BOX 847  
ELKHART, IN 46515

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Index	Attorney	Date	Hours	Stat	Matter Value	Task	Activity Description of Services Rendered
84397	00375MBW	01/31/97	<del>2.20</del> 5.6	B	<del>1,517.00</del> 1036.-		Prepared for and attended hearing on the proposed cash collateral and adequate protection agreement with NBD; meeting with Mr. Dygert before hand to discuss the nature of the hearing and argued the motion to the judge and later met with the US Trustee to discuss the status of the sale prospects and with Innkeeper's counsel to discuss the proposed terms of a cash collateral adequate protection agreement with Innkeepers (5.6)
90526	00517SAR	01/31/97	3.60	B	324.00		Assisted in preparing for Hearing on Cash Collateral (.5); filed various motions, notices and orders with clerk's office (.3); attended Cash Collateral Hearing and took notes of same (1.0); office conference with attorneys Watkins, Keller and Adey regarding status of negotiations and additional work yet to be completed (.5); telephone conference with Jill Rice regarding date for objections and hearing on Notice of Joint Motion to Approve Stipulation for Adequate Protection and Use of Cash Collateral and Request for Emergency Hearing (.2); further conferences with attorney Watkins regarding faxing copy of Notice to 20 largest creditors in addition to mailing same to all creditors (.2); telephone conference with Court Administrator regarding finalization

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190533 00520SMK 01/31/97 ~~4.40~~ B ~~770.00~~  
-7 122.50

of notice and arranged for courier to obtain  
original of same (.3); oversaw mass mailing of  
Notice and faxing of same to 20 Largest  
Creditors (.6).

[REDACTED]

[REDACTED] reviewed Motion  
for Order Authorizing and Approving  
Post-Petition Interim Financing Arrangement,  
form of Order and form of Notice (.4);  
[REDACTED]; reviewed  
cash collateral pleadings (.3);  
[REDACTED]

[REDACTED] 144.00

[REDACTED] 120.00

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

17496 00517SAR 02/06/97 .30 B 27.00

Prepared letter to attorney Trowhill enclosing copy of Joint Motion to Approve Stipulation for Adequate Protection and for Use of Cash Collateral and Request for Emergency Preliminary Hearing. Also advised we could not put his name on the matrix list.

5411 00520SMK 02/06/97 ~~6.38~~ B ~~1,102.50~~

5.7

997.50

[REDACTED]; numerous telephone conferences with Dave Dygert regarding post-petition financing issues (1.5);

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telephone conference with Attorney Fritz regarding post-petition financing issues (.2); several telephone conferences with Court personnel regarding notice issues relating to emergency post-petition financing motion (.4);

numerous telephone conferences with Attorney Hostetler regarding post-petition financing issues (1.0);

telephone conference call with Attorney Fritz and Attorney Lord regarding post-petition financing issues (.3); received and reviewed letter from Attorney for Gemini Plastics regarding request for copy of adequate protection stipulation and conferred with Paralegal Money regarding same (.2); telephone conference with Ms. Stephan regarding various post-petition operation issues (.2); telephone conference with Mr. Lucase regarding post-petition financing issues (.2); received and reviewed draft of joint motion to approve stipulation for adequate protection and to use cash collateral and related pleadings proposed by Innkeepers (.6); telephone conference with Attorney Hostetler regarding issues relating to Innkeepers cash collateral documents (.2); received and reviewed Certificate of Deposit Assignment and Pledge Agreement (.3); drafted form of Promissory Note to evidence post-petition financing loan from Dave and Phyllis Dygert to debtor (.6).

5426

00520SMK

02/07/97

~~8.90~~ B

~~1,557.50~~

3.2

560.-

Drafted memo to Dave Dygert regarding Innkeepers' cash collateral proposal (.3); made revisions to draft of Promissory Note and drafted memos to Dave Dygert, Attorney Hostetler and Attorney Fritz regarding same (.6); telephone conference with Dave Dygert regarding Innkeepers' cash collateral proposal and Promissory Note (.2);

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15445 00520SMK 02/08/97 ~~-1.50~~ B 262.50  
S 87.50

08171 00375MBW 02/10/97 ~~-7.00~~ B ~~-1,443.00~~  
9 166.50

[REDACTED] telephone conferences with Attorney Hostetler and Dave Dygert regarding revisions to draft of Promissory Note and made final revisions to same (.6); drafted memo to Attorney Lord regarding revised draft of Promissory Note (.2); extensive telephone conference with Attorney Fritz regarding Innkeepers' cash collateral agreement and negotiations with Flexsteel and prepared notes regarding same (.5); extensive telephone conference with Attorney Hostetler regarding Innkeepers' cash collateral agreement and other matters (.3); drafted memo to Dave Dygert regarding final form of Promissory Note (.2);

[REDACTED] received and reviewed revised Cash Collateral Agreement from Attorney for Innkeepers (.3);

Received and reviewed Appearance pleadings filed by counsel for Innkeepers and objection to cash collateral stipulation with NBD Bank (.2); [REDACTED] drafted memo to Attorney Watkins regarding second draft of Innkeepers' cash collateral agreement (.3);

(.9) [REDACTED] reviewed and made revisions to the updated draft of the cash collateral stipulation with Innkeepers forwarding the revisions to Innkeepers counsel

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15454 00520SMK 02/10/97 ~~7.20~~ B ~~1,260.00~~  
3-1 542.50

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] worked on draft of Emergency Motion to Approve Post-Petition Financing provided by Dave and Phyllis Dygert (1.6); [REDACTED]

[REDACTED], telephone conference with Alex Edgar regarding Creditors Committee issues and pending post-petition financing issues (.2); [REDACTED]

[REDACTED]

[REDACTED], telephone conference with Attorney O'Connor regarding Flexsteel's post-petition financing documents (.2); [REDACTED]

[REDACTED] made extensive revisions to draft of Emergency Motion relating to Flexsteel's post-petition financing (1.1); [REDACTED]

[REDACTED]

508208 00375MBW 02/11/97 7.10 B ~~1,313.50~~  
-6 111.50

[REDACTED]

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Billing Attorney: Geoffrey K. Church

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15473 00520SMK 02/11/97

~~260~~ B

~~1,600,00~~

5.3

927.50

~~\_\_\_\_\_~~ further reviewed and commented on the updated drafts of the Flexsteel financing motion and interim order and motion and order to re-pay Mr. Dygert's personal post-petition loan. (.6)

made revisions to Motions for approval of post-petition financing provided by Dave and Phyllis Dygert and Motion for approval of post-petition financing to be provided by Flexsteel (1.8);

drafted Interim Order for Approval of Post-Petition Financing provided by Dave and Phyllis Dygert (1.3); made revisions to Interim Order Approving Post-Petition Financing to be provided by Flexsteel (.9); drafted memos to Attorney Hostettler, Attorney Lord and Dave Dygert regarding Motion and Order with respect to Dygert post-petition financing (.3); drafted

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37577 00375MBW 02/12/97 ~~3.60~~ B ~~666.00~~  
- 8 148.-

memos to Attorney Hostetler, Attorney Lord and Attorney Laich regarding Motion and Order relating to Flexsteel post-petition financing (.3); telephone conference with Attorney Hostetler regarding revisions to Flexsteel and Dygert post-petition financing motions and orders and worked on same (.7).

(-3)

[REDACTED] continued preparation for filing the asset sale application and related papers, [REDACTED]

[REDACTED] also negotiated the final terms of the cash collateral/adequate protection agreement with Innkeepers' counsel and reviewed and commented on updated drafts of the Flexsteel financing application. (-5)

15497 00520SMK 02/12/97 ~~7.70~~ B ~~1347.50~~  
4.5 787.50

Telephone conference with Dave Dygert regarding post-petition financing issues (.2); made additional revisions to post-petition financing motions and forms of Order (.6); [REDACTED]

[REDACTED] extensive telephone conference with Attorney O'Connor regarding revisions to Flexsteel post-petition financing motion and order and proposed order on sale of assets and prepared notes regarding same (.5); telephone conference with Dave Dygert regarding post-petition financing issues (.2); [REDACTED]

[REDACTED] made revisions to Flexsteel Post-Petition Financing Motion and form of Order (.4); drafted memos to Attorney O'Connor, Attorney Hostetler and Attorney Lord regarding revised draft of Emergency Motion and form of Order with respect to post-petition

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Billing Arrangement: Hourly

financing to be provided by Flexsteel (.6);  
drafted form of Notice for Motion regarding  
post-petition financing provided by Dave Dygert  
(.5); drafted form of Notice with respect to  
Motion for Approval of Flexsteel Post-Petition  
Financing (.3); telephone conference with Court  
Clerk regarding notice and hearing issues;  
drafted memos to Attorney Hostetler and  
Attorney Lord regarding Emergency Motion and  
form of Order with respect to post-petition  
financing provided by Dave Dygert (.4);  
telephone conference with Attorney Hostetler  
regarding additional revisions to Dave Dygert  
and Flexsteel post-petition financing motions  
and form of Orders and made revisions to same  
(.6); received and reviewed executed copy of  
Promissory Note from debtor to Dave and Phyllis  
Dygert (.2).

~~07338 00332GKC 02/12/97 2.40 B 504.00~~

08219 00375MBW 02/13/97 ~~5.30~~ B ~~880.50~~  
- 4 74. -

[REDACTED]

[REDACTED]

(+4) having various discussions with the judge's  
clerk to advise of the emergency need for the  
financing and to schedule the hearing thereon  
and on the sale application;

[REDACTED]

[REDACTED]

~~08219 00317SAR 02/13/97 2.70 B 243.00~~

BK000962

**Billing Arrangement: Hourly**

15523      00520SMK      02/13/97      ~~8.70~~      B  
5.1

~~1,522.50~~

892.50

Several telephone conferences with Attorney Church regarding various issues relating to post-petition financing to be provided by Flexsteel (.4); telephone conference with Attorney Hostetler regarding post-petition financing documents (.2); [REDACTED]

made additional revisions to Flexsteel post-petition financing motion and form of order (.4); numerous conferences with Court personnel regarding hearing and notice issues (.8); numerous conferences with Attorney Watkins with respect to all pending negotiations and financing motions (.6);

[REDACTED] drafted memo to Attorney O'Connor regarding revised drafts of post-petition financing documents (.3); [REDACTED]

several telephone conferences with Attorney O'Connor regarding post-petition financing to be provided by Flexsteel and Creditor Committee issues (4); [REDACTED]

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roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 13 (13)

Billing Arrangement: Hourly

made additional revisions to emergency motion and form of Order relating to post-petition financing as requested by Attorney Van Laere (.4);

several telephone conferences with Attorney Hostetler regarding post-petition financing issues raised by Creditors Committee (.4); telephone conference with Attorney Van Laere regarding same (.2); made additional revisions to Flexsteel post-petition financing motion and form of Order (.4); telephone conference call with Attorney Watkins and Alex Edgar regarding post-petition financing issues (.2); drafted letter to Attorney Sphramson regarding post-petition financing issues (.4).

09579 00375MBW 02/14/97 4.20 B 1,147.00  
3.8 703.-

(1.9)

(.5)

responded to inquiries from creditors regarding the cash collateral motions and orders and the sale process; had many discussions with counsel for Flexsteel and the Committee regarding the sale process and the interim financing being provided by the buyer; had discussions with Committee's counsel and NBD Bank's counsel over the Committee's objections to the interim cash collateral/adequate protection agreement; (.6) received and reviewed the final form of the proposed cash collateral/adequate protection agreement with Innkeepers with discussions with Innkeepers' counsel regarding filing same; (.8)

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Proforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

[REDACTED]

515544 00520SMK 02/14/97 ~~6.50~~ B ~~1,137.50~~  
4.1 717.50

Telephone conference with Court personnel regarding issues relating to Emergency Financing Motions (.2); several conferences with Attorney Watkins regarding additional revisions to Post-Petition Financing Motions and Orders required by Flexsteel and the Creditors Committee and made same (.9); finalized Emergency Motions for Approval of Post-Petition Financing Arrangements, Exhibits, forms of Order, Notices and conferred with Paralegal Money regarding filing (.8);

several telephone conferences with Dave Dygert regarding Orders approving post-petition financing arrangements and transfer of funds from Flexsteel (.5); drafted memo to Attorney O'Connor and to Flexsteel regarding Order Approving Post-Petition Financing Arrangement and wiring instructions (.5); drafted memos to Attorney Van Laere, Attorney Hostetler and Attorney Lord regarding Order Approving Post-Petition Financing Arrangement with Flexsteel (.5); telephone conference with Attorney Church regarding Orders approving post-petition financing and hearing date on sale application (.2); telephone conference with Attorney O'Connor regarding Order approving post-petition financing arrangement and tail insurance issues (.2); telephone conference call with Attorney Church and Attorney Watkins regarding post-petition financing, information requested by Creditors

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0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

Committee and asset sale issues (.3);

09597 00375MBW 02/15/97 .20 B 37.00

Conferred with NBD's counsel regarding the revisions to the final form of the order approving the cash collateral/adequate protection agreement required by Committee's counsel and approved by the Bank.

09632 00375MBW 02/17/97 1.90 B 361.50  
- 3 55.50

(.3) had various discussions with NBD's counsel over replenishment of the \$70,000 CD repaid by the debtor and with regard to NBD's negotiations with Creditor's Committee and Innkeepers over finalizing the cash collateral/adequate protection issues;

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0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

11585 00375MBW 02/18/97 2.90 B 526.50  
.4 74.-

further conferred with NBD's counsel regarding the consensual resolutions of the objection of Innkeepers and the Committee to the adequate protection agreement with NBD and reviewing amendments to be made to the agreement and made further preparation for the closing of the asset sale to Flexsteel.

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0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

~~00000000 02/19/97 1.00 B 550.00~~

12288 00375MBW 02/19/97 ~~4.40~~ B ~~814.00~~  
E 148.-

[REDACTED]

[REDACTED]

[REDACTED]

had discussions with NBD's counsel, the court's  
deputy and U.S. Trustee regarding the need to  
cancel the final hearing on NBD's final cash  
collateral order because of Judge Rodibaugh's  
illness and alternative of presenting same to  
Judge Dees in Indianapolis for signature; (05)

[REDACTED]

received the fully signed joint  
stipulation with Innkeepers on its cash  
collateral/adequate protection agreement and  
began preparation of the form of notice and  
interim order approving same; (03)

[REDACTED]

~~00000000 02/19/97 1.00 B~~

[REDACTED]

26564 00000000 02/19/97 1.00 B 215.00

[REDACTED]

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roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

~~15200 00532CKC 02/18/97 1.80 B 378.00~~

~~00537FNC 02/20/97 1.50 B 19.50~~

~~00543FAD 02/20/97 1.50 B 0~~

113741 00375MBW 02/20/97 ~~3.30~~ B 510.50  
- 8 148.-

~~00517DAR 02/20/97 1.00 B 11.00~~

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(- 8) finalized the  
notice and form of order regarding the  
Innkeepers cash collateral stipulation and had  
same filed along with the stipulation;

[REDACTED]

[REDACTED]

BK000969



[illegible]

● 2019 年 12 月 1 日

~~ACCION 005205M 02/20/97 .40 B 70.00~~

\_\_\_\_\_

(.5)

BK000970

Proforma Number 164777 06/24/97  
10288902 DYGERT SEATING, INC.  
10288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 20 (20)

Billing Arrangement: Hourly

526671 005220K2 02/24/97 157.50

515237 005220K2 02/24/97 147.00

515247 005220K2 02/24/97 126.00

516202 005220K2 02/24/97 27.00

515645 00375MBW 02/24/97 7.00 B 1,295.00

- 4 74,-

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

received the court's final order approving the  
NBD cash collateral agreement; responded to  
various inquiries of the Clerk's office  
regarding the recently filed stipulated cash  
collateral agreement with Innkeepers;

[REDACTED]

(.4)

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reforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 25 (25)

Billing Arrangement: Hourly

~~26555 00520SMK 02/27/97 2.50 B 644.00~~

~~00010 00531BJC 02/27/97 1.00 288.00~~

~~00016 00759JWM 02/27/97 1.50 B 2.00~~

21233 00375MBW 02/28/97 12.20 B 2,257.00

- 6

111. -

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(.6) [REDACTED], also arguing the debtor's position with respect to the financing motions before the Court as well and agreeing to continue the hearing on the Innkeepers Cash

BK000972

Proforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 26 (26)

Billing Arrangement: Hourly

Collateral Agreement.

027000 0014BKR 02/28/97 2.00 B 0

006000 0014BKR 02/28/97 2.016.00

022270 0014BKR 02/28/97 499.50

026111 00375BKR 03/02/97 .80 B 100.00

000000 00375MBW 03/03/97 9.70 B 100.00

000000 00375BKR 03/03/97 100.00

000000 00375BKR 03/03/97 120.00

040000 00000BKR 03/03/97 2.30 B 100.00

039110 00375MBW 03/04/97 .20 B 22.00

BK000973

Proforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

~~00375MBW 03/12/97 1.50 B 225.00~~

~~00375MBW 03/13/97 1.50 B 125.50~~

~~54075 00375MBW 03/13/97 1.50 B 80.00~~

~~00375MBW 03/13/97 1.50 B 435.00~~

4562 00375MBW 03/14/97 1.40 B 259.00  
- 2 37.-

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

BK000974

roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

~~005175AK 03/17/97~~

54908 00520SMK 03/17/97 ~~2.80~~ B ~~665.00~~  
. S 87.50

~~44426 00552GRC 03/17/97 11.50 B 0.415.00~~

~~40286 007550MM 03/17/97 1.00 B~~

BK000975

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] received and reviewed letter from attorney Kfroymsen regarding proposed revisions to Innkeepers' cash collateral order and telephone conference with attorney Fritz regarding same (.5);

[REDACTED]

[REDACTED]

[REDACTED]

reforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

=====

47057 00375MBW 03/18/97 4.70 B 869.50  
1.9 351.50

[REDACTED]

Prepared for and attended the rescheduled hearing on the Innkeepers cash collateral/adequate protection agreement and reported to the court the resolution of the Committee's objection and reported the results of the hearing to the other parties and later conferred with Judge's clerk regarding the need to notice the amended agreement and to set same for final hearing;

(1.9)

[REDACTED]

51001 00375MBW 03/18/97 1.00 B 332.50

[REDACTED]

51002 00375MBW 03/18/97 1.70 B 357.00

[REDACTED]

51003 00375MBW 03/18/97 1.00 B 332.50

[REDACTED]

BK000976

roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

48745 00375MBW 03/24/97 2.80 B 518.00

48745 00375MBW 03/24/97 2.80 B 518.00

48745 00375MBW 03/24/97 2.80 B 518.00  
- 6 111.-

Finalized form of notice ordered by the court with respect to the agreed order on the Innkeepers cash collateral/adequate protection agreement and resolving the Committee's objection thereto and further receiving all original signatures to the Agreed Order and having same submitted to the Court.

(6)

48745 00375MBW 03/24/97 2.80 B 518.00

48745 00375MBW 03/24/97 2.80 B 518.00

49620 00375MBW 03/25/97 2.30 B 425.50  
0.4 74.-

BK000977



Proforma Number 164777 06/24/97  
00288902 DYGERT SEATING, INC.  
00288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 37 (37)

Billing Arrangement: Hourly

(.4)

[REDACTED] responded to various inquiries of the Clerk's office regarding the tender of the agreed order approving the Innkeepers cash collateral/adequate protection agreement and scheduling the final hearing and objection date;

00288902 06/25/97 1.00 B 80.00

00288902 06/26/97 3.20 B 672.00

00288902 06/26/97 .30 B

00288902 06/26/97

00288902 06/26/97 .20 B 35.00

00288902 06/26/97 .20 B 35.00

00288902 06/26/97 .60 B

BK000978

Proforma Number 164777 06/24/97  
10288902 DYGERT SEATING, INC.  
10288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 42 (42)

**Billing Arrangement: Hourly**

04/15/97 .50 B 65.00

83652 00375MBW 04/16/97 ~~2.70~~ B ~~499.50~~  
1.4 259.-

(1.4)

Attended hearing on the final approval of the Innkeepers cash collateral/adequate protection agreement, preparing for same; [REDACTED]

59.80

10,405.50

~~0012 005170AR 04/16/97 .20 B 12 00~~

398181 00500000 04/18/57 1.40 B 245.00

013 00530

103050 103050 01/21/51 153 2 103050

00575MBW 04717791 2.40 B

54.00

005205MR

589134 005520RE 01/21/01 147.00

BK000979

**EXHIBIT D**

288902            DYGERT SEATING, INC.  
000001            GENERAL - Asset Sale

**TIME SUMMARY BY ATTORNEY**

	<u>Attorney</u>	<u>Hours</u>	<u>\$/Hour</u>	<u>Charge</u>
00136 SPM	S. Merchant	1.10	90.00	99.00
00321 RWB	R. Benko	0.00		
00343 MAJ	Courier-SB		65.00	NONE
00375 MBW	M. Watkins	135.30	185.00	25,030.50
00516 GFL	G. Lutkus	0.00		
00517 SAR	S. Money	1.20	90.00	108.00
00520 SKM	S. Keller	61.00	175.00	10,675.00
00531 BJC	B. Clark	3.30	180.00	594.00
00532 GKC	G. Church	113.40	210.00	23,814.00
00545 MJA	M. Adey	0.00		
00548 CMB	C. Benedict	0.00		
00746 TDK	T. Knox	0.00		
00756 CMK	C. Kelly	5.60	130.00	728.00
00759 JWM	J. Maciejczyk	0.00		
	<b>TOTAL</b>	<b>320.90</b>		<b>61,048.50</b>

roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 2 (2)

Billing Arrangement: Hourly

\*\*\*\*\* MATTER BILLING ADDRESS \*\*\*\*\*  
0288902 DYGERT SEATING, INC.  
ATTN: MR. DAVE DYGERT  
P.O. BOX 847  
ELKHART, IN 46515

\*\*\*\*\* CLIENT BILLING ADDRESS \*\*\*\*\*  
DYGERT SEATING, INC.  
ATTN: MR. DAVE DYGERT  
P.O. BOX 847  
ELKHART, IN 46515

0288902-000001 GENERAL

Index	Attorney	Date	Hours	Stat	Matter Value	Task	Activity Description of Services Rendered
84397	00375MBW	01/31/97	<del>8.20</del> 2.6	B	<del>1,517.00</del> 481.00		

having various discussions with Mr. Dygert, Attorney Church and NBD's counsel re the status and nature of the on-going discussions with Inkeepers as to the terms of an arrangement to sell the Inkeeper's claims to permit the sale to go forward and advising Attys Keller and Adey of the state of these matters in my upcoming absence. 2.6

BK000981

Performa Number 164777 06/24/97  
10288902 DYGERT SEATING, INC.  
10288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 3 (3)

Billing Arrangement: Hourly

190533 00520SMK 01/31/97

~~4.40~~ B

1.9

~~770.00~~

332.50

493662 00532GKC 01/31/97

~~4.30~~ B

2.7

~~903.00~~

567.00

[REDACTED] had meeting with Attorney Watkins regarding status of negotiations with Flexsteel and Innkeepers for sale of assets and various motions and pleadings to be filed early in the bankruptcy case (.4);

[REDACTED] several conferences with Attorney Watkins regarding status of negotiations with Innkeepers and other pending matters (.5); reviewed drafts of Emergency Application to Sell Assets Free and Clear of Liens, form of Order, form of Notice, Motion to Shorten Notice Period on Application to Sell Assets and form of Order (.6);

[REDACTED]; reviewed commercial real estate analysis (.2); [REDACTED] reviewed liquidation analysis (.2); reviewed recent Innkeepers correspondence (.2).

[REDACTED] phone conferences with G. Lord, C. Fritz to negotiate settlement with Brewster; phone conferences with J. O'Connor re: terms of Agreement and extending deadline; conference with D. Dygert, T. Frick, G. Lucchese and C. Dygert; phone conferences with C. Fritz and G. Lord; phone conference with M. Watkins. *re Innkeeper Settlement*

BK000982

Form Number 164777 06/24/97  
288902 DYGERT SEATING, INC.  
288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 4 (4)

Billing Arrangement: Hourly

13704 00532GKC 02/01/97 ~~1.80~~ B 328.00  
1.4 336.<sup>00</sup>

17459 00517SAR 02/03/97 .20 B 18.00

15346 00520SMK 02/03/97 ~~6.30~~ B 1,102.50  
.4 70.<sup>00</sup>

93718 00532GKC 02/03/97 6.60 B 1,386.00

15370 00520SMK 02/04/97 ~~6.30~~ B 1,207.50  
4.2 1,085.<sup>00</sup>

[REDACTED] phone conference with D. Dygert re: Innkeepers demand and status with Flexsteel; phone conference with G. Lord re: proposed agreement with Innkeepers; phone conference with D. Dygert re: same; drafted Settlement Agreement with Innkeepers.

[REDACTED]  
Prepared and arranged for filing of Certificate of Service of Notice.

Conferred with Attorney Church regarding status of negotiations with Flexsteel and Innkeepers (.2); received and reviewed correspondence from attorney for Innkeepers regarding information relating to proposed sale to Flexsteel (.2);

[REDACTED]  
Numerous phone conferences with D. Dygert, S. Hostetler, J. O'Connor, G. Lord and S. Keller to discuss negotiating with Innkeepers and Flexsteel.

[REDACTED]  
numerous telephone conferences with Dave Dygert regarding negotiations with Innkeepers in connection with proposed sale to Flexsteel (1.8); numerous telephone conferences with Attorney Hostetler regarding negotiations with NBD in connection with proposed sale to Flexsteel (1.4); several conferences with

BK000983

ofirma Number 164777 06/24/97  
288902 DYGERT SEATING, INC.  
288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 5 (5)

Billing Arrangement: Hourly

.5389 00520SMK 02/05/97 ~~5.88~~ B 1,015.00  
4.2 735.<sup>00</sup>

Attorney Watkins regarding status of all sale negotiations (.4);

numerous telephone conferences with Attorney O'Connor regarding negotiations with Flexsteel and drop dead date for Asset Purchase Agreement (1.2); extensive telephone conference with Attorney Lord regarding negotiations with Innkeepers and prepared notes regarding same (.4); telephone conference with Attorney O'Connor regarding decision by Flexsteel to terminate sale negotiations (.2); several telephone conferences with Dave Dygert regarding same and orderly liquidation issues (.6); received and reviewed letter from attorney for Flexsteel regarding confirmation of Flexsteel's decision to terminate purchase negotiations (.2).

Numerous telephone conferences with Dave Dygert regarding Flexsteel's termination of sale negotiations, and Chapter 11 alternatives including orderly liquidation issues (2.4); numerous telephone conferences with Attorney Hostetler regarding Flexsteel's termination of sale negotiations and orderly liquidation issues and prepared notes regarding same (1.2); extensive telephone conference with Attorney Church regarding status of all pending matters (.3); extensive telephone conference with Attorney Fritz regarding Flexsteel's termination of sale negotiations and remaining alternatives (.3);

BK000984

ofoma Number 164777 06/24/97  
288902 DYGERT SEATING, INC.  
288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 6 (6)

Billing Arrangement: Hourly

.5426 00520SMK 02/07/97 ~~6.90~~ B 1,557.50  
~~4.4~~  
5.2 910.<sup>00</sup>

[REDACTED]

[REDACTED]

[REDACTED]; numerous  
extensive telephone conferences with Dave  
Dygert regarding negotiations with Flexsteel  
and other alternatives to reorganize or sell  
the company (2.4); numerous telephone  
conferences with Attorney Hostetler regarding  
negotiations with Flexsteel and Innkeepers  
(2.0);

[REDACTED]

BK000985



coforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 7 (7)

Billing Arrangement: Hourly

15445 00520SMK 02/08/97 ~~1.50~~ B ~~262.50~~  
.6 105.<sup>00</sup>

08171 00375MBW 02/10/97 ~~7.80~~ B ~~1,443.00~~  
3.3 610.50

[REDACTED]

several telephone conferences with Attorney O'Connor regarding negotiations with Flexsteel (.6);

[REDACTED] conferred with Paralegal Money regarding bankruptcy information requested by Flexsteel (.2).

[REDACTED]  
received and reviewed revised draft of Asset Purchase Agreement from Flexsteel (.6);  
[REDACTED]

[REDACTED]

(1.6) Reviewed the debtor's latest claim settlement offer to Innkeepers and Innkeepers counter-proposal, with various discussions with Mr. Dygert, attorney Keller and NBD's counsel re: same

[REDACTED]

BK000986

Proforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 8 (8)

Billing Arrangement: Hourly

and reviewed the most updated draft of the proposed purchase agreement sent by Flexsteel's counsel; forwarding comments to counsel for review. (1.7)

515454 00520SMK 02/10/97 7.20 B 1,260.00  
2.9 507.50

; several telephone conferences with Attorney Hostetler regarding status of negotiations with Flexsteel and Innkeepers (.8);

; telephone conference with Attorney Weldon regarding negotiations with Innkeepers (.2);

; extensive telephone conference with Attorney Lord regarding Innkeepers position on sale of assets (.3);

; several conferences with Attorney Watkins regarding all pending negotiations (.4);

; received and reviewed extensive written counterproposal from Attorney for Innkeepers and had meeting with Attorney Watkins regarding same (.8); drafted memo to Dave Dygert regarding Innkeepers' counterproposal (.2); drafted memo to Attorney Church regarding same (.2).

Had various and extensive discussions and negotiations with counsel for Innkeepers, Mr. Dygert and Flexsteel's counsel to finalize the terms of the settlement of the method and

508208 00375MBW 02/11/97 7.10 B 1,313.50  
6.5 1202.50

BK000987

roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 9 (9)

Billing Arrangement: Hourly

- amount of the payment of Innkeepers' secured claim and advised NBD's counsel re: same, had further discussions with Flexsteel's counsel and Mr. Dygert to finalize the purchase agreement, updated and finalized the sale application, notice and form of order and motion to expedite the sale and form of order to submit to the court, (1.3)
- (.5)
- (4.7)

00520SMK 02/11/97 3.1 542.50

15473 00520SMK 02/11/97 -9.60 B 1,680.00  
3.1 542.50

Telephone conference call with Attorney Watkins and Dave Dygert regarding response to Innkeepers' counterproposal (.3); telephone conference with Attorney Hostetler regarding status of all negotiations (.2); drafted memo to Attorney Hostetler regarding Innkeepers' counterproposal (.2);

several telephone conferences with Attorney O'Connor regarding Flexsteel purchase and financing issues (.8); several telephone conferences with Attorney Watkins and Attorney Lord regarding negotiations with Innkeepers (.9); telephone conference call with Attorney Watkins and Dave Dygert regarding negotiations with Innkeepers (.5); drafted memo to Attorney O'Connor regarding Creditor Committee issues (.2);

BK000988

roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

Page 10 (10)

Billing Arrangement: Hourly

07577 00375MBW 02/12/97 ~~3.60~~ B ~~666.00~~  
2.0 370.<sup>00</sup>

[REDACTED]

[REDACTED]

[REDACTED] various  
discussions with Mr. Dygert, attorneys Keller  
and Church, Bob Irwin and the Bark's counsel  
and Flexsteel's counsel regarding the sale and  
closing process and items to be accomplished  
with respect to finalizing and concluding the  
statement with Innkeepers on its secured claim; (.9)  
further updating the sale application pleadings  
and having further discussions with attorney  
Church and paralegal Money regarding reserving  
hearing dates with the court on the sale and (1.1)  
interim financing applications.

[REDACTED]

15497 00520SMK 02/12/97 ~~9.70~~ B ~~1,347.50~~  
2.2 385.<sup>00</sup>

[REDACTED] worked on  
draft of extensive letter to Attorney Lord  
regarding terms and conditions of proposed  
settlement with Innkeepers (2.2);

[REDACTED]

BK000989

roforma Number 164777 06/24/97  
0288902 DYGERT SEATING, INC.  
0288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

07996 00532GKC 02/12/97 2.40 B 504.00

[REDACTED]

Phone conferences with D. Dygert, M. Watkins, S. Keller and J. O'Connor re: closing, asset purchase agreement, interim financing and Chapter 11 filings; letter to G. Boyn; phone conference with D. Dygert re: agreement with Innkeepers.

08219 00375MBW 02/13/97 ~~5.30~~ B 980.50  
4.9 906.50

[REDACTED]

Received and reviewed the final draft of the purchase agreement with Flexsteel and discussing the approval of same with attorney Church and counsel for Flexsteel; making arrangements for the parties' execution and later received the signed signature pages; (1.7) prepared the sale application, order and notice, and purchase agreement for filing with the court and also met with Flexsteel's local counsel to review these pleadings as well as the pleadings on the Flexsteel financing to answer local counsel's inquiries and to integrate his comments into the pleadings; (2.4)

[REDACTED]

[REDACTED] further having various discussions with counsel for the Creditor's Committee regarding the nature of the sale and the need for the buyer's working capital advances with various discussions with Mr. Dygert and NBD Bank's counsel advising of same. (.8)

[REDACTED]

BK000990

Billing Arrangement: Hourly

15523      00520SMK      02/13/97      ~~8.70~~ B  
3.0

1,522.50

525,6

extensive telephone conference call with Attorney Watkins, Attorney Church and Attorney O'Connor regarding all pending issues relating to proposed sale (.5); [REDACTED]

several telephone conferences with Attorney O'Connor regarding final sale negotiations and post-petition financing documents for Flexsteel (.6);

██████████; telephone conference with M&I  
Leasing regarding status of proposed sale of  
assets to Flexsteel (.2); ██████████

letter to Attorney Ephramson regarding assets to Flexsteel and trade creditor issues (.6); several telephone conferences with Dave Dygert regarding cash need issues and execution of purchase agreement with Flexsteel (.4);

[REDACTED], attended meeting with Attorney Watkins and Attorney Van Laere regarding Motions and Orders relating to proposed sale of assets to Flexsteel and post-petition financing

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10586 00532GKC 02/13/97 3.40 B 714.00

09579 00375MBW 02/14/97 ~~6.20~~ B ~~1,149.00~~

2.4

444.-

(.4);

telephone conference call with Attorney Watkins and Attorney Ephramson regarding Creditor Committee issues (.3);

Phone conference with D. Dygert re: terms of Agreement; review letter from J. O'Connor; drafted Exhibits C, D, E, F, G, H and I; conference with J. O'Connor; phone conference with S. Keller; conference with D. Dygert and T. Frick; phone conferences with J. O'Connor; phone conference with M. Watkins and S. Keller; phone conference with D. Dygert; phone conference with S. Keller; phone conference with M. Watkins. All with regard to the sale application.

Filed the sale application along with the purchase agreement and related pleadings, forwarding copies to Mr. Dygert and counsel for the Creditor's Committee along with the service list and confirming with the Court the date for objections and the sale hearing;

(1.6)

discussed various closing issues with Flexsteel's local counsel. (.8)

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Billing Attorney: Geoffrey K. Church

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515544 00520SMX 02/14/97 ~~6.50~~ B ~~1,137.50~~

~~4.8~~  
2.4

420.-

[REDACTED]

[REDACTED]

worked  
on draft of extensive letter to Attorney Lord  
regarding agreement with Innkeepers on terms  
and conditions of settlement of debt (1.8);

[REDACTED]

BK000993



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10623 00532GKC 02/14/97 .90 B 189.00

[REDACTED] telephone conference call with Attorney Watkins and Attorney Van Laere regarding issues relating to sale of assets, tail insurance and jurisdiction issues (.4); telephone conference with Attorney Lord regarding status of Flexsteel transaction and Innkeepers issues (.2).

Phone conferences with S. Keller, M. Watkins, D. Dygert re: Asset Purchase Agreement, Interim Financing and Flexsteel; letter to M. Watkins with all real estate leases; letter to D. Dygert re: execution copies of Asset Purchase Agreement and Cash Collateral Order.

10640 00532GKC 02/15/97 .20 B 42.00

[REDACTED]  
Letter to G. Lord with copy of Asset Purchase Agreement and all exhibits and schedules as requested.

10632 00375MBW 02/17/97 ~~1.00~~ B ~~351.50~~  
1.6 296.-

Reviewed and commented on the draft of the proposed joint press release to be issued by Dygert and Flexsteel regarding the purchase transaction, with discussions with Mr. Dygert regarding same; [REDACTED]

[REDACTED] reviewed and revised draft of the settlement confirmation with Innkeepers over the terms of the settlement of Innkeepers' claim and the method and manner of payment of same. (1.1)

10641 00517SAR 02/17/97 1.00 B

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110682 00532GKC 02/17/97 .60 B 126.00

[REDACTED]

Phone conference with J. O'Connor re: press release and executed Agreements; phone conference with D. Dygert re: same; revised Press Release.

111585 00375MBW 02/18/97 ~~2.90~~ B ~~536.50~~  
1.5 277.50

Made final revisions to the letter confirming the settlement agreement with Innkeepers, including descriptions of each of the real properties and leasehold interests involved; (1.5) conferred with attorney Church regarding offer made by Plyfoam to pay off its note at a slightly discounted rate and with counsel for NBD for approval to accept the discount; (1.2)

[REDACTED]

117775 00520SMK 02/18/97 ~~3.70~~ B ~~647.50~~  
1.1 192.50

Reviewed proposed revisions to extensive letter to attorney Lord regarding terms and conditions of settlement with Innkeepers and conferred with attorney Watkins regarding same (.2); worked on extensive revisions to letter to attorney Lord (.5); telephone conference with attorney Church regarding Flexsteel closing issues (.2); drafted memo to attorney Church regarding draft of extensive letter to attorney Lord (.2);

[REDACTED]

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15197 00532GKC 02/18/97 1.60 B 336.00

Phone conferences and conference with D. Dygert; phone conferences with M. Watkins; began review of Innkeepers agreement; phone conference with G. Lord re: same and re: hearing.

12288 00375MBW 02/19/97 ~~4.40~~ B ~~814.00~~  
3.1 573.50

(.4)

Conferred with attorney Keller regarding Creditor Committee's stated basis for its objection to be filed to the sale application and began discussing the responses to these objections; began preparation of detailed letter to Creditor Committee counsel to respond to his request for information concerning the debtor's efforts to reorganize, sell or attract investors prior to the Flexsteel transaction; (2-7)

26555 00517SMK 02/19/97 1.00 B 30.00

BK000996

26564 00520SMK 02/19/97 ~~1.00~~ B ~~315.00~~  
1.4 245.50

Extensive telephone conference with Attorney Church regarding revisions to extensive

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settlement proposal letter to Attorney Lord,  
made revisions and finalized same (.9);  
extensive  
telephone conference with Attorney Efraymson  
regarding various Creditors Committee issues  
and objection to proposed sale and prepared  
notes regarding same (.3); conferred with  
Attorney Watkins regarding Creditors Committee  
issues (.2).

005320KC 02/10/98 1.80 B 270.00

005320KC 02/10/98 1.80 B 270.00

005320KC 02/10/98 1.80 B 270.00

113741 00375MBW 02/20/97 3.30-B 610.50  
1.4 259.-

(1.2)

Continued preparation of letter to Creditors  
Committee's counsel describing the debtor's  
efforts to sell the company prior to the  
Flexsteel transaction; conferred with the U.S.  
Trustee regarding the Creditors Committee's  
stated objections to the sale;

had  
discussions with NBD's counsel regarding the  
projected final sale price and the objections  
to the sale to be raised by the Committee and  
the arrangement made to submit the agreed cash  
collateral order with NBD to the court for  
approval. (.2)

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26618 00520SMK 02/20/97 .40 B 70.00

Telephone conference with Attorney Church regarding Creditors Committee's issues and negotiations with Innkeepers (.2); conferred with Attorney Watkins regarding same (.2).

14440 00375MBW 02/21/97 3.50 B 647.50

1.6

296.5

(.5) reviewed the Closing document checklist prepared by Flexsteel's counsel with discussions with Trustee's local counsel regarding same;

conferred with Mr. Dygert regarding additional efforts made by the company prior to the Flexsteel transaction to sell the assets incorporating these matters into the letter to Committee's counsel describing same and completing and forwarding the letter; conferred with Mr. Dygert regarding the updated analysis on the projected final sale price. (.2)

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126671 00520SMK 02/21/97 ~~1.30~~ B 157.50  
- 3 52.50

~~115243 00532GKC 02/22/97 .60 B 126.00~~

115243 00532GKC 02/22/97 .60 B 126.00

116292 00136SPM 02/24/97 .30 B 27.00

~~15645 00375MBW 02/24/97 ~~7.00~~ B 1,295.00~~

15645 00375MBW 02/24/97 ~~7.00~~ B 1,295.00  
6.4 1184.-

[REDACTED]

[REDACTED]

[REDACTED] received and reviewed memo from Attorney Church regarding negotiations with Innkeepers, tax issues and closing issues relating to Flexsteel and conferred with Attorney Church regarding same (.3);

[REDACTED]

[REDACTED]

Work on Innkeepers agreement; letter to G. Lord with current lease extension agreement for Georgia.

Conferred with Church regarding obtaining Certificate of Existence from the Secretary of State of Indiana and a Certificate of Good Standing from the Secretary of State of Georgia for Dygert Seating and coordinated both.

[REDACTED]

Began preparation of testimony and cross examination outline's of the debtor's president and representatives of the secured creditors and Flexsteel for the sale hearing and also organizing materials for the trial notebook, including an analysis of the monies paid by the debtor towards the Goshen Cushion purchase; (.5)

[REDACTED]

(.4) [REDACTED] received and reviewed the Committee's written objections to the sale and the retention papers of Committee's counsel, conferred with Flexsteel's counsel

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regarding the objections filed by the Committee  
and the objection to be filed by the US  
(.3) Trustee, conferred with attorney Church  
regarding the approval needed to discount the  
Plyfoam obligation. (.2)

16582 00532GKC 02/24/97 2.90 B 609.00

Review <sup>clearing</sup> checklist and prepare additional list;  
phone conference with D. Dygert; conference  
with C. Kelly re: Georgia tax clearances; phone  
conference with M. Watkins; phone conference  
with J. O'Connor; phone conference with M.  
Watkins; phone conference with G. Gaskill;  
phone conference with B. Haut re: Molded Foam  
discount proposal; phone conference with M.  
Watkins. All re: clearing matters.

37048 00756CMK 02/24/97 .80 B 104.00

Calls to Georgia Department of Revenue  
regarding tax clearance certificates.

17499 00136SPM 02/25/97 .10 B 9.00

Reviewed Certificate of Good Standing received  
from the Secretary of State of Georgia and a  
Certificate of Existence from the Secretary of  
State of Indiana and forwarded same to Church.

16773 00375MBW 02/25/97 7.40 B 1,369.00

Continued preparation of the testimony and/or  
cross examination outlines of Dave Dygert and  
representatives of both secured creditors and  
(2.6) Flexsteel, discussing the testimony to be  
(.9) presented by NBD and Flexsteel with their  
respective counsel, prepared draft of the  
Debtor's response to the Committee's objection  
(1.2) to the sale application; conferred with Mr.  
Edgar over the Trustee's limited objection to  
(.2) the sale; conferred extensively with counsel  
for PlyFoam about compromising the dispute over  
the continuing liability of PlyFoam under a  
(.4) non-compete agreement; made revisions to the  
proposed sale order to conform to requests by  
Committee's counsel, Flexsteel and to  
incorporate the approval for the settlement  
(.6) with PlyFoam; had extensive conference with

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- (.6) Innkeepers counsel over preparation for the sale hearing and the testimony of Innkeepers witness; had extensive conference with Committee's counsel over his objections to the sale application and to the proposed cash collateral and adequate protection agreement with Innkeepers and preparing letter to Innkeepers to advise of the Committee's objection as requested by Committee's counsel.
- (.9)

26786	00520SMK	02/25/97	<del>.50</del> B	<del>87.50</del>
			.3	52.50
17578	00532GKC	02/25/97	2.30 B	483.00
37074	00756CMK	02/25/97	.50 B	65.00
21158	00375MBW	02/26/97	<del>9.10</del> B	<del>1,683.50</del>
			8.2	1,517.-

reviewed draft of response to Creditors Committee's objection to Flexsteel sale and conferred with Attorney Watkins regarding same (.3).

Phone conference with B. Haut re: amount of discount; phone conference with D. Dygert; conference with D. Dygert; phone conference with M. Watkins; phone conference with S. Hostetler; phone conference with B. Haut; phone conference with M. Watkins; phone conference with G. Lord. all re: closing issues

Letter to Georgia Department of Revenue regarding tax clearance certificates.

(2.9) Met with Mr. Dygert along with attorney Church to discuss Mr. Dygert's testimony at the sale hearing, the hearing procedures and closing issues; further discussed preference matters and those items required by Innkeepers to

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release the liens and guarantees and make other preparations for the hearing; received from Flexsteel's counsel and integrated into the updated draft of the proposed sale order language required by Flexsteel respecting the assets being purchased and conferring with Flexsteel's counsel regarding same and the expected testimony of Flexsteel's

- (.8) representative, conferred with counsel for NBD regarding the status of the Committee's obligation and the expected testimony of NBD's representative,

[REDACTED]

finalized and filed the response to the Committee's objections to the sale, incorporating additional comments noted by Mr. Dygert about inaccuracies in the Committee's objection and continued revising the testimony outline of Mr. Dygert based on our earlier discussions and otherwise preparing for the hearing, including preparation of the hearing exhibits and updated liquidation analysis.

(4-2)

26847 00520SMK 02/26/97

3.00 B

665.00

3.6

630.1

Telephone conference with Attorney Church regarding negotiations with Innkeepers (.2); received and reviewed letter from Attorney Efraymson regarding Creditors Committee issues with respect to post-petition operations and proposed sale to Flexsteel and drafted memo to Attorney Church regarding same (.3);

[REDACTED]

several extensive conferences with Attorney Watkins regarding issues related to closing with Flexsteel and negotiations with Innkeepers and resolution of various issues raised by Creditors Committee (.8); telephone conference call with Attorney Church and Attorney Lord regarding additional revisions to Innkeepers settlement agreement and prepared notes regarding same (.3); conferred with Attorney Church regarding follow-up on negotiations with Innkeepers and tax issues (.2); telephone conference call with Attorney Watkins and Attorney Van Laere regarding issues relating to hearing on Motion for Approval of Sale to Flexsteel (.2); telephone conference with Dave Dygert regarding revisions to settlement agreement with Innkeepers and Flexsteel closing issues (.2); made extensive

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25952 00531BJC 02/26/97 1.00 B 180.00  
25960 00532GKC 02/26/97 5.50 B 1,155.00

~~25952 00531BJC 02/26/97 1.00 B 180.00~~

~~25960 00532GKC 02/26/97 5.50 B 1,155.00~~

~~25952 00531BJC 02/26/97 1.00 B 180.00~~

~~25960 00532GKC 02/26/97 5.50 B 1,155.00~~

21190 00375MBW 02/27/97 ~~7.40~~ B ~~1,369.00~~  
7.0 1,295.-

~~25952 00531BJC 02/26/97 1.00 B 180.00~~

revisions to Flexsteel settlement letter (1.4).

Reviewed tax issue on Dygert sale; telephone conference with J. Thomas (McGladrey).

Prepare for meeting; phone conference with G. Lord; phone conference with J. O'Connor; phone conference with S. Keller; conference with D. Dygert and M. Watkins to prepare for hearing; phone conference with G. Lucchese re: providing employee personnel files to Flexsteel; conference with J. Maciejczyk; phone conference with G. Lucchese; phone conference with D. Dygert re: M & I; phone conference with B. Haut; letter to Plyfoam. all in connection with sale.

(.2) Received and reviewed the US Trustee's limited objection to the sale; [REDACTED]

(6.8) [REDACTED] had various and extensive discussions with counsel for NBD, Flexsteel and the Committee regarding the sale hearing and evidence and testimony and continuing objection; finalized the testimony and cross-exam outlines; conferred further with PlyFoam's counsel over the disputed claim and prospects for a negotiated resolution; various conferences with Mr. Dygert over the sale hearing process and PlyFoam and M&I leasing issues and conferring with M&I's counsel regarding same and made further preparations for the hearing, including organizing the hearing notebook and exhibits, completing the updated liquidation analysis.

BK001003

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26935 00520SMK 02/27/97 2.90 B 507.50

[REDACTED]

Received and reviewed message from Attorney Clark regarding tax issues relating to settlement with Innkeepers (.2); made additional revisions to Innkeepers settlement agreement and drafted memo to Dave Dygert regarding same (.9); telephone conference with Dave Dygert regarding final approval of Innkeepers settlement agreement and response to Creditors' Committee's objection to Flexsteel sale and drafted memo to Dave Dygert regarding same (.4); several conferences with Attorney Watkins regarding Flexsteel sale hearing issues and settlement with Innkeepers (.5); conducted research regarding issues relating to enforcement of payment for non-competes obligations owed to Dygert Seating and conferred with Attorney Watkins regarding same (.9).

26016 00531BJC 02/27/97 1.60 B 288.00

Worked on tax issues for transaction; multiple telephone conferences with McGladrey; conference with S. Keller; conference with M. Watkins.

[REDACTED]

21233 00375MBW 02/28/97 11.60 B 27257.00  
11.6 2146.-

11.6

Made final preparations for the hearing on the sale application including meeting with Mr. Dygert to review his anticipated testimony and attended the sale hearing and presented argument and the testimony of Mr. Dygert and examination of the other witnesses and participated in settlement discussions with counsel for all other parties resulting in stipulated resolution to approve the sale and at the parties' insistence, began drafting the agreements reached into an agreed form of sale order to present to the Court.

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5 [REDACTED]

526097	00532GKC	02/28/97	9.60	B	2,016.00
521270	00375MBW	03/01/97	2.70	B	499.50
526114	00532GKC	03/02/97	.80	B	168.00
539087	00375MBW	03/03/97	7.70	B	1,424.50
552263	00520SMK	03/03/97	.60	B	105.00
540258	00531BJC	03/03/97	.70	B	126.00
540267	00532GKC	03/03/97	2.30	B	483.00
539118	00375MBW	03/04/97	.20	B	37.00

[REDACTED]

Prepare for and attend hearing on emergency petition to sell assets and negotiate agreed order.

Made revisions to the form of order approving the asset sale to incorporate the parties' agreement at the hearing and as read into the record and incorporated additional comments by Flexsteel as to the identity of the assets being purchased and made further revisions based on the circumstances of the hearing.

Letter to G. Lord; letter to J. O'Connor; review pleadings and notes. (in closing)

Forwarded the updated draft of the sale Order to the parties for comment and received and negotiated comments from all parties and inserted the comments into a further update of the form of order and re-circulating same and receiving each parties approval and finalized the order and tendered same to the judge for signature and entry by the extended deadline; discussed open closing issues and requirements with attorneys Church, O'Connor and Van Laere.

Several conferences with Attorney Watkins regarding issues relating to final approval of Order granting Application to Sell Assets to Flexsteel (.4); telephone conference with Attorney Lord's office regarding same (.2).

Reviewed the IRA question with G. Church; reviewed IRA issues.

Review revised Order Approving Sale; conference with B. Clark; phone conference with M. Watkins; phone conference with D. Dygert; began drafting closing documents; phone conference with M. Watkins; phone conference with D. Dygert.

Received certain of the original signature pages to the Agreed Order Approving Sale to

BK001005

**Billing Arrangement: Hourly**

11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

tender to the court and discussing certain pre-closing issues with attorney Van Laere.

552290	00520SMK	03/04/97	2.30	B	402.50
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Worked on draft of "cash at closing" option settlement agreement proposed for resolving Innkeepers' indebtedness.

540277	00532GKC	03/04/97	2.40	B	504.00
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Draft closing documents; phone conference with S. Hostetler; phone conference with M. Watkins; phone conferences with D. Dygert re: closing, timing and related issues; phone conference with J. O'Connor; phone conference with J. O'Connor re: drafts of all closing documents.

539777 00375MBW 03/05/97 ~~3.10~~ B ~~573.50~~

1-1

~~573.50~~

203.50

(.7)

Reviewed certain of the proposed closing documents required of the debtor and making revisions and comments; [REDACTED]

conferred with Flexsteel's counsel over the timetable for pre-closing and closing; (LZ)  
conferred with attorney Keller regarding concerns raised by Flexsteel's counsel over the sufficiency of the sale proceeds to pay NBD; (LZ)

52312	00520SMK	03/05/97	2.70	B	472.50
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Received and reviewed letter from Attorney Lord regarding issues to be resolved for closing of Flexsteel transaction and settlement of Innkeepers' indebtedness (.2); extensive telephone conference with Attorney O'Connor regarding closing issues, Elkhart real estate issues and issues raised by Innkeepers and prepared notes regarding same (.4); conferred with Attorney Watkins regarding issues raised by Innkeepers and Flexsteel (.2); extensive telephone conference with Dave Dygert regarding same (.3); concluded drafting and made revisions to "cash at closing" option settlement agreement proposed for resolution of Innkeepers' indebtedness (1.6).

0031/SAR - 03/06/97 - 80 - B - 12-00

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552331 00520SMK 03/06/97 3.60 B 630.00

Received and reviewed court minutes on hearings on post-petition financing motions and hearing on emergency application to sell assets (.2); extensive telephone conference with Geoff Church regarding various issues relating to closing with Flexsteel, resolution of Innkeepers' indebtedness and alternative settlement agreements proposed to Innkeepers (.4); received and reviewed letter from Attorney Hostetler regarding Flexsteel closing issues (.2); worked on draft of real estate equity option settlement agreement proposed for Innkeepers' indebtedness (2.8).

541245 00532GKC 03/06/97 4.70 B 987.00

Phone conferences with S. Hostetler, M. Watkins, D. Dygert, and J. O'Connor; prepare documents for pre-closing; conference with D. Dygert re: pre-closing and open issues and review of revised documents; prepare outline for discussion.

556831 00756CMK 03/06/97 .40 B 52.00

Calls to Georgia Department of Revenue.

540500 00375MBW 03/07/97 ~~7.00~~ B ~~1,443.00~~  
7.3 1,350.50

(.4) Received correspondence from Flexsteel's counsel regarding comments to the closing documentation, correspondence from counsel to NBD regarding arrangements NRB and Innkeepers are making with respect to the lien releases to be given at closing as required by Flexsteel, including review of proposed intercreditor and non-disturbance agreements, attended lengthy meeting with Mr. Dygert and President, CEO and counsel for Flexsteel to discuss remaining open business and legal issues for the closing and the transition of operations, including review of updated anticipated purchase price less allowances and other deductions and discussed Flexsteel's intentions respecting the real estate leases and production related matters and further addressed Flexsteel's notice to not recommend the purchase to its board unless the purchase agreement is amended to exclude the purchase of certain troubled accounts and other concessions with discussions with attorney Church and Mr. Dygert as to how to respond to Flexsteel's notice to force compliance with the purchase agreement;

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00517SAR 03/07/97 1.80 B 315.00

52350 00520SMK 03/07/97 1.80 B 315.00

Made revisions to cash at closing option settlement agreement for Innkeepers' indebtedness and drafted memo to attorney Church and attorney Watkins regarding same (.5); conferred with attorney Watkins regarding various closing issues with Flexsteel (.2); continued drafting and made revisions to real estate equity option settlement agreement (1.1).

41254 00532GKC 03/07/97 6.50 B 1,365.00

6.2 Prepare for and attend conference of D. Dygert, M. Watkins, B. Lauritsen, R. Klosterman and J. O'Connor to discuss closing adjustments, purchase proposal for real estate and related issues; conference with M. Watkins; phone conference with D. Dygert. (.5)

40518 00375MBW 03/08/97 1.90 B 351.50

Reviewed and made comments to letter from attorney Church to Flexsteel's counsel demanding that Flexsteel abide by the terms of the purchase agreement as to all the assets it agreed to buy and reviewed draft of the Settlement and Release Agreement prepared for execution by Dygert and Innkeepers and reviewed notes for prior Board approval by Flexsteel which Flexsteel now disclaims.

41270 00532GKC 03/08/97 2.50 B 525.00

Revise documents; letter to J. O'Connor with changed pages; conference with D. Dygert; revise letter to J. O'Connor re: meeting last Friday; phone conference with J. O'Connor. As closing matters.

41339 00375MBW 03/10/97 3.20 B 522.00

.4 74.-

4 with Mr. Dygert and attorney Van Laere regarding the concerns raised by Flexsteel which may impede the closing.

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Billing Arrangement: Hourly

52375 00520SMK 03/10/97 ~~1.80~~ B ~~140.00~~  
.6 105.-

[REDACTED], made revisions to real estate equity option settlement agreement and drafted memo to attorney Church regarding same (.6).

41279 00532GKC 03/10/97 1.20 B 252.00

Phone conference with J. O'Connor; revise letter to J. O'Connor; phone conference with D. Dygert; phone conference with S. Hostetler; phone conference with D. Dygert; phone conference with M. Watkins. *re: Flexsteel Sale adjustments*

41354 00375MBW 03/11/97 ~~1.00~~ B ~~185.00~~  
.8 148.-

[REDACTED]  
reviewed letter from Flexsteel's counsel outlining its alleged basis to walk away from the closing and noting inaccuracies in the letter as the stated bases for further negotiations and otherwise discussing with attorney Church actions the Debtor might take to cure or claim waiver of the alleged defaults and discussed Flexsteel's stated intent otherwise to nonetheless proceed to closing. (.8)

52406 00520SMK 03/11/97 1.30 B 227.50

Conferred with attorney Church regarding draft of cash at closing option settlement agreement and real estate equity option settlement agreement (.2); drafted memo to Dave Dygert regarding drafts of alternative settlement agreements (.3); received and reviewed proposed revisions to settlement agreement forms from attorney Church and worked on same (.8).

41892 00532GKC 03/11/97 3.50 B 735.00

Phone conference with D. Dygert; phone conference with M. Watkins; phone conference with J. O'Connor re: documents; revise letter to J. O'Connor; phone conference with D. Dygert; complete checklist for closing; phone conference with G. Lord; phone conference with S. Hostetler; phone conference with J. O'Connor. *re: closing matters.*

42056 00375MBW 03/12/97 .40 B 74.00

Reviewed and updated changes to certain of the closing documents and responded to inquiries of NBD's counsel regarding status of the closing and continuing negotiations.

54858 00520SMK 03/12/97 .90 B 157.50

Extensive conference with attorney Church

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Billing Arrangement: Hourly

42714 00532GKC 03/12/97 2.50 B 525.00

regarding revisions to alternative drafts of settlement agreement proposed for Innkeepers' indebtedness and worked on revisions (.6); drafted memo to attorney Lord regarding draft of real estate equity option settlement agreement (.3).

42867 00375MBW 03/13/97 2.30 B 425.50

Conference call with S. Hostetler and G. Lord re: Flexsteel proposal to purchase real estate; phone conference with D. Dygert re: Board approval, terms and price calculations; review letter from S. Hostetler re: certificate of no unpaid administrative expenses; letter to J. O'Connor.

Conferred with attorney Church and attorney Van Laere regarding remaining open closing issues, including allocation of the purchase price, agreement with Flexsteel and M & I Leasing and need to reject the lease by the debtor and name change documentation and began preparing the corporate minutes and certificates to effect the name change and assignment of the name to Flexsteel; reviewed the proposed amendment to the purchase agreement to conform to the amendments set forth in the order approving the sale; conferred with attorney Van Laere regarding Flexsteel's Board's decision to approve the sale; reviewed demand to Molded Form for payment of the delinquencies; and otherwise assisted in the continued preparations for closing.

43326 00532GKC 03/13/97 3.50 B 735.00

Conference with D. Dygert; phone conference with J. O'Connor; phone conference with M. Watkins; phone conference with D. Dygert; revise Employment Agreement; letter to J. O'Connor re: same; phone conference with S. Kuhn. re: closing monies.

45262 00375MBW 03/14/97 ~~1.40~~ B ~~259.00~~

1.2

222.-

(.4)

Conferred with attorney Van Laere regarding the rejection of the M&I leases based on Flexsteel's agreement to directly purchase the leased goods and requesting lease copies from Rita Stephan to prepare the motion; had later conferences with attorney Van Laere regarding status of name change documentation and received certificates for assumed name to be completed by Flexsteel at the closing and also

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(.5) discussing the purchase price allocation determined by Flexsteel; conferred with attorney Church regarding open closing issues to be resolved by negotiation at the closing;

[REDACTED] with message [REDACTED] reviewed the proposed Steelmaster agreement with respect to the liens on the debtor's molds and debt cancellation; making notes of revisions to be made. (.3)

[REDACTED]

44432 00532GKC 03/14/97 5.90 B 1,239.00

Worked on closing documents; draft agreements to release tool liens; phone conferences with D. Dygert, G. Lord, J. O'Connor, S. Hostetler, M. Watkins and J. Matthews and S. Keller re: closing issues; phone conferences with G. Gaskill; conference with B. Irwin. re closing issues

56903 00756CMK 03/14/97 3.00 B 390.00

Prepare joint resolutions and name change amendment; calls to Georgia Department of Revenue.

45277 00375MBW 03/15/97 .50 B 92.50

Had lengthy discussion with attorney Church regarding status of closing issues, including allocation of purchase price, real estate purchase in escrow, lien releases from secured creditors and statutory lienholders holding molds and dies and discussed the debtor's latest calculation of the purchase price.

44435 00532GKC 03/15/97 3.70 B 777.00

Phone conference with D. Dygert re: closing numbers; phone conference with M. Watkins re: same; work on closing documents; prepare for closing.

45279 00375MBW 03/17/97 12.00 B 2,220.00

Attended and assisted in the escrowed closing of the sale of the debtor's assets to Flexsteel pursuant to the sale order, conducting and finalizing the negotiations with Flexsteel and the secured creditors over the calculation of the purchase price for the assets and collateral sale of the real property and

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Billing Arrangement: Hourly

57854 00517SAR 03/17/97 .30 B 27.00

54908 00520SMK 03/17/97 ~~3.80~~ B ~~665.00~~  
1.1 192.50

obtaining the requisite releases under the terms of the Purchase Agreement; preparing and finalizing various of the closing documents, including the real estate purchase agreements; further discussing with the parties the continuation of the case in the bankruptcy court and the conditions and requirements to close the transactions out of escrow; and had negotiations with NBD's and Innkeeper's counsel over resolving the objections of the Committee to the Innkeeper's cash collateral agreement and finalizing the agreed order approving same to submit to the court.

regarding motion to reject  
conferred with attorney  
Watkins regarding Flexsteel closing issues and proposed changes to Innkeepers' cash collateral order (.2);

telephone conference with attorney Efrogmson regarding Flexsteel closing issues and motion to reject M & I equipment leases (.2); several conferences with attorney Watkins regarding additional issues relating to Flexsteel closing (.7);

44436 00532GKC 03/17/97 11.50 B 2,415.00

Prepare for conference; extended conferences with D. Dygert, C. Dygert, G. Lucchese, M. Watkins, J. O'Connor, B. Lauritsen, R. Klosterman, G. Lord, B. Irwin, S. Hostetler to negotiate final terms of sale; redraft and execute all agreements.

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Billing Arrangement: Hourly

45473 00375MBW 03/18/97 ~~4.70~~ B ~~869.50~~  
1.8 333.-

(1.8)

54921 00520SMK 03/18/97 1.90 B 332.50

45997 00532GKC 03/18/97 1.70 B 357.00

46180 00375MBW 03/19/97 ~~2.10~~ B ~~388.50~~  
.6 111.-

(.6)

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] assisted attorney Keller in preparing the revisions to the agreement with Innkeepers over the payment of its claim and release of liens based on final negotiations at the closing;

Several conferences with attorney Watkins regarding Flexsteel closing issues and additional revisions to settlement agreement with Innkeepers (.4); reviewed proposed revisions to settlement agreement and worked on revised draft of settlement agreement (.6); reviewed extensive additional revisions to settlement agreement proposed by attorney Watkins and worked on same (.9).

Finalize closing documents; prepare for meeting, etc.; phone conference with R. Irwin; phone conference with R. Klosterman and J. O'Connor re: initial payment; phone conference with D. Dygert; phone conference with G. Lucchese; phone conference with R. Klosterman; phone conference with R. Irwin. *At closing preparation*

Further revised the Settlement and Release Agreement with Innkeepers concerning Innkeepers obligation under the Sale Order to deposit \$30,000 of the sale proceeds with the estate and discussing same with attorney Church as well as confirmation of Flexsteel's wire of that portion of the purchase price to satisfy NBD's claim and also discussed payment of all outstanding administrative fees of the estate out of the sale proceeds;

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57903 00520SMK 03/19/97 1.40 B 245.00

[REDACTED]

Conferred with Attorney Watkins regarding additional revisions to Innkeepers settlement agreement and made same (.6); drafted memo to Attorney Church regarding revised settlement agreement (.2); several conferences with Attorney Watkins regarding Flexsteel closing issues and possible dismissal of bankruptcy case (.4); conferred with Attorney Church regarding Flexsteel closing issues and issues relating to Flexsteel settlement agreement (.2).

46942 00532GKC 03/19/97 ~~3.10~~ B ~~651.00~~

2.4

504.-

[REDACTED]

phone conference with S. Keller; phone conference with M. Watkins; phone conference with D. Dygert; phone conference with P. Dillard re: Georgia transaction; phone conference with R. Klosterman; fax to R. Klosterman, re: closing matters

[REDACTED]

57948 00520SMK 03/20/97 .50 B 87.50

[REDACTED]

Received and reviewed letter and extensively revised draft of settlement agreement from Attorney Lord and drafted memo to Attorney Watkins regarding same.

48503 00532GKC 03/20/97 .40 B 84.00

Phone conference with D. Dygert; review agreement with Innkeepers.

47784 00375MBW 03/21/97 ~~4.90~~ B ~~906.50~~

4.1

758.50

(1.4) Continued preparation of the Report of the Sale of the Assets to Flexsteel and ancillary transactions; [REDACTED]

[REDACTED]

(2.7) [REDACTED] and reviewed revised form of Innkeepers Settlement and Release Agreement respecting the asset and related sales to Flexsteel prepared by Innkeepers' counsel with memorandum to Mr. Dygert addressing various aspects of the new terms as agreed at the

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Billing Arrangement: Hourly

48532 00532GKC 03/21/97 .40 B 84.00

~~70.50~~

48745 00375MBW 03/24/97 ~~2.00~~ B ~~510.00~~

2.2 407.-

~~70.50~~

51365 00532GKC 03/24/97 ~~70~~ B ~~147.00~~  
.6 126.-

49620 00375MBW 03/25/97 ~~2.30~~ B ~~425.50~~  
1.1 203.50

pre-closing and further proposing various suggested revisions.

~~70.50~~

~~510.00~~

~~510.00~~

(.2) Completed initial draft of the Report of the Asset Sale to Flexsteel and ancillary transactions; (l. 8) conferred with Innkeepers' counsel regarding the continuation of the state court proceedings against the debtor and guarantors under a restricted basis; and conferred with attorney Church regarding the preliminary indication that the final adjusted purchase price payable from Flexsteel may be insufficient to fully satisfy NBD's claims. (.Z)

~~147.00~~

Phone conference with D. Dygert re: closing statement; fax to Innkeepers and memo to Dave; phone conference with S. Hostetler; phone conference with M. Watkins;

(.9) Completed revisions to and updated the draft of the Report of Sale pending the final closing and distribution numbers;

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reviewed correspondence from NBD regarding its payment. (.2)

Finalized and forwarded draft of the Report of Sale to Mr. Dygert for review, comment and for insertion of the final, adjusted closing numbers and began preparation of letter to Innkeepers' counsel with various comments and suggested revisions to the Settlement and Release Agreement being negotiated.

Conferred with Attorney Watkins regarding  
Flexsteel closing issues and final settlement  
with Innkeepers. \*

Phone conferences with M. Watkins and J.  
O'Connor; revise letter. on ~~the~~ closing matters

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.54002 00343MAJ 03/27/97 .30 B 19.50

.72984 00517SAR 03/27/97 .70 B 53.00

.57110 00532GKC 03/27/97 2.00 B 420.00

.61082 00136SPM 03/28/97 .30 B 27.00

.55089 00375MBW 03/28/97 ~~3.40~~ B ~~629.00~~  
1.2 222.00

Conference with B. Irwin re: payoff calculations and closing/payment proceeding; complete real estate documents; phone conferences with R. Taylor re: amendment, assessment and resolution.

Reviewed Articles of Amendment received from Church for DPD, Inc. for filing with the Secretary of State of Indiana and coordinated same.

Finalized and forwarded to Innkeepers' counsel letter addressing our comments to his draft of the Settlement and Release Agreement and received and reviewed his response to our comments and having further discussions with Innkeepers' counsel over finalizing the Agreement and discussed the pending analysis of the final purchase price from the asset closing;

(1.2)

.57175 00532GKC 03/28/97 1.80 B 378.00

Prepare for real estate closing; phone conferences with D. Dygert, M. Watkins and G. Lord; phone conference with J. O'Connor; revise letters; phone conference with J. O'Connor re:

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Billing Arrangement: Hourly

7190 00532GKC 03/29/97 1.00 B 210.00  
8156 00375MBW 03/31/97 2.00 B 370.00

70766 00532GKC 03/31/97 4.70 B 987.00

70817 00756CMK 03/31/97 .90 B 117.00

8943 00136SPM 04/01/97 .40 B 36.00

~~7190 00375MBW 04/01/97 1.00 B 210.00~~

~~7190 00375MBW 04/01/97 1.00 B 210.00~~

76375 00532GKC 04/01/97 ~~1.60~~ B ~~336.00~~

1.2

252.-

closing, closing statement, etc.; phone conference with D. Dygert re: payments to Innkeepers; phone conference with M. Watkins; phone conference with D. Dygert.

Preparation for closing on real estate.

Assisted attorney Church in the closing of the real estate sales to Flexsteel and consequent payment towards Innkeepers' claims, including receipt and review of the updated draft of the Settlement and Release Agreement with Innkeepers from its counsel and negotiating final comments to same and advising Mr. Dygert and attorney Church of these negotiations.

Prepare for conference and closing; phone conferences with J. O'Connor re: closing, approval of documents and transfers; phone conference with Elkhart Title re: easement and restriction copies; fax to O'Connor; conference with D. Dygert; phone conference with M. Watkins; conference at Elkhart Title to close real estate transaction.

Prepare sales disclosure form for Flexsteel property transaction.

Reviewed rejection form received from the Secretary of State of Indiana for the Articles of Amendment to Dygert Seating; conferred with Church regarding same and faxed biennial annual report for 1997/1998 to Church for execution by client.

~~7190 00375MBW 04/01/97 1.00 B 210.00~~

~~7190 00375MBW 04/01/97 1.00 B 210.00~~

Review financial information; review and revise report to court; letter from J. O'Connor with signed closing statement; letter to D. Dygert; phone conference with D. Dygert;

BK001018

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288902 DYGERT SEATING, INC.  
288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

~~1002 00340EMB 04/02/97 .00 B 68.00~~

~~12424 00750CMK 04/01/97 1.00 B 247.00~~

~~15513 00375MBW 04/02/97 .00 B 39.00~~

16404 00532GKC 04/02/97 .90 B 189.00  
126.-

~~16404 00375MBW 04/02/97 .20 B 37.00~~

~~16404 00375MBW 04/04/97 .40 B 36.00~~

16113 00375MBW 04/04/97 .20 B 37.00

16462 00532GKC 04/04/97 1.20 B 252.00

~~16462 00375MBW 04/07/97 .40 B 36.00~~

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Conference with D. Dygert re: Milliken, revising documents to be signed, administrative expenses and state filings; [REDACTED] letter to T. Frick with closing information; letter to G. Lord with Settlement Agreement; [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Conferred with attorney Church regarding his comments to the draft of the Report of Sale and further discussed Mr. Dygert's preparation of the final closing analysis and the preference analysis.

Reviewed letter from G. Lord; letter to G. Lord re: same; complete revision of closing list for transcripts; phone conference with M. Watkins.

[REDACTED]

BK001019

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Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

17090 00375MBW 04/07/97 3.80 B 703.00

Received and reviewed attorney Church's comments to the draft of the Report of Sale and incorporating same along with additional and updating revisions and forwarded an updated draft of the Report to counsel for NBD, Innkeepers and the Committee for review along with letter describing the additional information needed to finalize the Report and later conferring with Mr. Dygert regarding the status of the remaining information needed to complete the Report, particularly the health claims and the environmental related fees.

17985 00375MBW 04/09/97 ~~3.90~~ B ~~166.50~~  
.8 148.-

Received form of "Notice of Disposition of Assets" Indiana Workforce Development Board has asked our client to complete and submit with respect to the asset sale but which Flexsteel does not want to be submitted; reviewing the applicable Indiana statutes referenced in the report form as to compliance matters and applicability to this sale, discussing same with Rita Stephan and [REDACTED]

(.6)

[REDACTED] Report  
conferred with Committee's counsel regarding the deposit by Innkeepers referenced in the Sale Order. (.2)

~~1115 00136SPH 04/14/97 .50 B 27.00~~

30843 00375MBW 04/14/97 2.00 B 370.00

Received letter from counsel to the Committee raising a number of inquiries about the sale closings and draft of the Report of Sale, preparing draft of letter responding to the inquiries and forwarding same to Mr. Dygert for review and to supply certain of the information needed to respond and further soliciting informational requests from Rita Stephan.

~~1115 00532GKC 04/14/97 .10 B~~

~~1115 00136SPH 04/14/97 .40 B 52.00~~

31708 00375MBW 04/15/97 .40 B 74.00

BK001020

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
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Billing Arrangement: Hourly

83652 00375MBW 04/16/97 ~~2.70~~ B ~~499.50~~  
- 6 111, -

~~CONFIDENTIAL~~

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64-24494-5400

082418-00520SMK 04/17/97 130 8 52.50

85154	00532GKC	04/17/97	.70	B	147.00
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[REDACTED]

\_\_\_\_\_

[REDACTED] received from Rita and began reviewing updated post-closing activity to update the Sale Report with and to also advise committees' counsel with this updated information. (.6)

[REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Letter to G. Lord with recorded deed and

BK001021

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Billing Arrangement: Hourly

remaining documents from Georgia closing;  
letter to D. Dygart; completed transcript;  
letter to J. O'Connor; letter to M. Watkins.

87850 00532GKC 04/22/97 .20 B 42.00

Phone conference with Denise Davis re: mortgage  
payment in Georgia.

BK001022

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00288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

59 ~~00075MBW 04/29/97 1.50 B~~

~~00075MBW 04/30/97 1.10 B 03.50~~

~~00075MBW 05/01/97 .90 B~~

~~00075MBW 05/01/97 .70 B~~

~~00075MBW 05/02/97 .60 B 140.00~~

612495 00532GKC 05/02/97 .30 B 63.00

~~00075MBW 05/02/97 .40 B 277.50~~

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Phone conference and letter to D. Dygert re:  
Georgia property.

[REDACTED]

BK001023

forma Number 164777 06/24/97  
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Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

12524 00532GKC 05/05/97 .10 B 42.00

145 00532GKC 05/06/97 .10 B 42.00

31017 00532RWB 05/10/97 .30 B 42.00

1 00532GKC 05/12/97 .20 B 42.00

16145 00532GKC 05/12/97 .20 B 42.00

1 00532GKC 05/13/97 .20 B 42.00

1 00532GKC 05/13/97 .10 B 42.00

16154 00532GKC 05/13/97 .20 B 42.00

16158 00532GKC 05/14/97 .20 B 42.00

1 00532GKC 05/15/97 .80 B 42.00

Receive letter from D. Davis re: payment of Georgia rent balance to Innkeepers; letter to D. Dygert re: same.

Phone conference with D. Davis re: mortgage payment and assumption.

Phone conference with M. Pupacovski of IBM re: sale of assets and requesting Notice of Ch. 11.

BK001024

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Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

00375MBW 05/21/97 .00 B 148.00

14803 00517GJR 05/22/97 .30 B 18.00

27339 00532GKC 05/21/97 .30 B 42.00

20587 00343MAJ 05/22/97 .30 B 50.00

00375MBW 05/22/97 .20 B 7.00

00517SAR 05/22/97 .30 B 9.00

00532GKC 05/22/97 .30 B 9.00

25 00343MAJ 05/22/97 .30 B 50.00

2404 00375MBW 05/23/97 .40 B 10.00

12178 00323RWB 05/27/97 .30 B 70.50

BK001025



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J288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

24060 00375MBW 05/27/97 .20 B 37.00

287 00-175MBW 05/29/91 4.40 B 014.00

31050	00532GKC	05/29/97	<del>5.00</del> B	<del>798.00</del>
			.6	126.1

00375MBW 05/30/97 1:00 B...

00531-B5C-05/30/97 1:00 B

00532GKC 05/30/97 .40 B

16778 00531BJC 06/02/97 .20 B

[illegible]

draft letter from Dave;  
letter to G. Lord; letter from G. Lord. *W. A. Lord*  
*closing*

[illegible]

BK001026

Billing Arrangement: Hourly

2647350	00375MBW	06/05/97	.90	B	166.50
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Began revisions to the Report of Sale to incorporate updated post closing financial numbers on cash receipts, disbursements and on remaining cash and administrative and other payables.

~~Researcher~~ [redacted] Post  
[redacted]  
ad [redacted] [redacted]

[illegible]

2647940 00375MBW 06/09/97 ~~3.30~~ B ~~610.50~~  
4 74.-

.4

[illegible]

Made final revisions and additions to  
the [REDACTED] report. Ited  
Ch [REDACTED] responses.

Confidentiality [REDACTED] Search  
reimbursement [REDACTED] for  
from [REDACTED] approval  
reimbursement [REDACTED]  
classification case.

Draft - Confidential - Not for Distribution

2649779 00375MBW 06/11/97 ~~2.78~~ B ~~199.50~~  
.9 166.50

• 9

[illegible]

BK001027

1288902-000001 GENERAL

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**Billing Arrangement: Hourly**

\_\_\_\_\_

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Phone conference with D. Dygert re: various unresolved matters with Flexsteel and Innkeepers; [REDACTED]

**Innkeepers:** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

BK001028

Proforma Number 165902 07/23/97  
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00288902-000001 GENERAL

Billing Attorney: Geoffrey K. Church

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Billing Arrangement: Hourly

658240 00532GKC 06/18/97 .10 B 21.00  
658289 00532GKC 06/19/97 .10 B 21.00

Letter from J. O'Connor re: Flexsteel review of  
balance due Dygert; letter to D. Dygert.

Letter to T. Frick. re. sub for issues.

Recon [REDACTED] of  
[REDACTED] el;  
[REDACTED]  
[REDACTED] n

Memo to [REDACTED] on  
[REDACTED] one  
[REDACTED]  
[REDACTED]

for paralegal SAM.

Arrang [REDACTED] with  
[REDACTED] Inc,  
[REDACTED] on

Revised [REDACTED]  
[REDACTED] art;  
[REDACTED] e.

[REDACTED] SAM.

F [REDACTED] tcy  
O [REDACTED] SAM.

Arran [REDACTED] der  
Account [REDACTED] of  
[REDACTED] for filing of [REDACTED]

Letter from [REDACTED] f  
[REDACTED] r;  
[REDACTED] ce  
[REDACTED] same;  
[REDACTED] e

BK001029

Proforma Number 174428 08/22/97  
00288902. DYGERT SEATING, INC.  
00288902-000025 BY INNKEEPERS OF GOSHEN, INC.

Billing Attorney: Geoffrey K. Church

Page 4 (4)

Billing Arrangement: Hourly

2650452 00375MBW 06/13/97 ~~1.80~~ B ~~232.00~~

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92.50

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2653729 00375MBW 06/19/97 .30 B 55.50

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(.5) Finalized and filed the Report of Sale including additional information about the name change and employee health claims;

Completed the the  
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Had discussions with counsel for Innkeepers regarding formalizing the assignment of the Plyfoam receivable and debtor's assistance in this regard and received order's approving the Report of Sale and Motion to Reject Leases.

Receiv

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preparing draft of  
response to same.

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same with NED's counsel and

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